

Archaeology Wales

Cerrigochion Road, Brecon

Cultural Heritage Impact Assessment



By Philip Poucher

Report No: 1445

Archaeology Wales Limited,
Rhos Helyg, Cwm Belan,
Llanidloes, Powys SY18 6QF
Telephone: 01686 440371
E-mail: admin@arch-wales.co.uk

Archaeology Wales

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Prepared For: Barton Willmore
on behalf of PAR Homes

Edited by: Mark Houliston

Signed: 

Position: MD

Date:

Authorised by: Mark Houliston

Signed: 

Position: MD

Date:

By
Philip Poucher

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CONTENTS

1. Introduction & Methodology	1
1.1 Introduction	1
1.2 Planning Policy Context	1
1.3 Impact Assessment Methodology	3
2. Baseline Conditions	9
2.1 Site Description	9
2.2 Previous archaeological studies	9
2.3 Site, Monument, Building and Landscape Designations	10
2.4 Historical Development	11
3. Potential Impacts	15
3.1 Sources of potential direct effects	15
3.2 Sources of potential indirect effects	15
3.3 Archaeological Remains	16
3.4 Historic Buildings	17
3.5 Historic Landscapes	19
4. Impact Significance	20
4.1 Archaeological Remains	20
4.2 Historic Buildings	21
4.3 Historic Landscapes	21
5. Mitigation	22
5.1 Overview	22
5.2 Archaeological Remains	22
5.3 Historic Buildings	22
5.4 Historic Landscape	23
6. Residual Impacts	23
7. Summary	25
8. Bibliography	27

List of Tables

Table 1	Summary of significance of impact on Archaeological Remains	20
Table 2	Summary of significance of impact on Historic Buildings	21
Table 3	Summary of significance of impact on HLCAs within the registered Historic Landscape	21
Table 4	Summary of significance of impact on registered Parks & Garden of Historic Interest	21
Table 5	Residual impacts	23

List of Figures

Figure 1	Site location
Figure 2	Proposed development outline
Figure 3	Zone of Theoretical Visibility (ZTV)
Figure 4	Designated archaeological sites within the ZTV
Figure 5	Designated archaeological areas within the ZTV
Figure 6	All archaeological sites within a 1km radius
Figure 7	Detail of archaeological sites surrounding proposed development
Figure 8	Tithe map of 1838/9
Figure 9	Ordnance Survey map of 1891
Figure 10	Lidar data

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11.0 ARCHAEOLOGY AND HERITAGE

Introduction

- 11.1 This chapter of the Environmental Statement assess the likely significance of the effects of the Proposed Development on the environment with respect to archaeology and heritage.
- 11.2 The Assessment has collated details of the known archaeological and historic Site Sites and **features, or 'heritage assets', and considered the potential for the presence of unknown or unrecorded heritage assets.** This information was used to produce an assessment of the historic environment of the area within which the Proposed Development lies.
- 11.3 The Assessment considers the likely significant effects of the Proposed Development on all of these heritage assets, including archaeological Site Sites, features and finds, **historic buildings and historic landscapes. Both potential 'direct' and 'indirect' effects on the historic environment** are considered. Where likely significant adverse effects are identified, mitigation measures to prevent, reduce, or offset them are proposed, and likely residual effects remaining after mitigation are determined.

Planning Policy Context

- 11.4 National Policies relating to archaeology and cultural heritage include the following:
- Ancient Monuments and Archaeological Areas Act 1979;
 - Planning (Listed Buildings and Conservation Areas) Act 1990; and
 - Planning Policy Wales (Edition 8, January 2016), Chapter 6 – Conserving the Historic Environment.
- 11.5 The National Assembly has recently (February 2016) agreed to the Historic Environment (Wales) Bill, currently in a period of intimation before coming into force, whereupon it will be referred to as the Historic Environment (Wales) Act 2016. This Bill provides amendments to the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990. The Bill also makes provisions for the compilation and maintenance of a register of historic parks and gardens, a list of historic place-names in Wales and accessible Historic Environment Records for each local authority,

as well as issuing guidance to local authorities in Wales, National Park authorities in Wales and Natural Resources Wales.

11.6 The Application Site has been allocated within the Brecon Beacons National Park Authority Local Development Plan (LDP), adopted December 2013, for mixed-use development.

11.7 Policies relating to cultural heritage within the LDP include:

- SP1 National Park Policy (i), which **states that “the scale, form, design, layout, density, intensity of use and use of materials will be appropriate to the surroundings and will maintain or enhance the quality and character of the Park’s Natural Beauty, wildlife, cultural heritage and built environment”;**
- SP3 Environmental Protection – Strategic Policy, **which states that “All proposals for development or change of use of land or buildings in the National Park must demonstrate that the proposed development does not have an unacceptable impact on, nor detract from, or prevent the enjoyment of; (e) cultural and historic heritage, including Blaenavon Industrial Landscape World Heritage Site, Registered Historic Parks Gardens and Historic Landscapes; and (f) the character of the built heritage, including listed buildings, conservation areas and archaeological features.**

11.8 Further specific Policies addressing the Historic Environment are included within section 3.15 of the LDP, and these include:

- Policy 15 Listed Buildings, **which states “All listed building consent applications will be determined in accordance with National Policy as set out in Circular 61/96”. Further detail is given within this policy, and Policy 16 also deals with the demolition of Listed Buildings;**
- Policy 17 The Setting of Listed Buildings, **which states “Development proposals which would adversely affect the setting of a listed building will not be permitted”;**
- Policy 18 Protection of Buildings of Local Importance, which states **“Development affecting buildings which make an important contribution to the character and interest of the local area as set out on the local list will be permitted where the distinctive appearance, architectural integrity or their settings would not be significantly adversely affected.”;**

- Policy 19 Development affecting Conservation Areas, **which states "New development and alterations to existing buildings within or affecting the setting of a Conservation Area will only be permitted where it will preserve or enhance the character or appearance of the area and where the design, all building materials, proportions and detailing are appropriate to the Conservation Area"**;
- Policy 20 Historic Parks and Gardens, **which states "Development which directly or indirectly, either alone or in combination affects those areas listed within Part 1 of the 'Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales' will be permitted where the essential integrity and coherence of the park or garden and its setting, as defined in the Register, is preserved or enhanced"**;
- Policy 21 Historic Landscapes, **which states "Development which directly or indirectly either alone or in combination affects those areas listed within Part 2 of the 'Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales' will only be permitted if the essential integrity and coherence of the area, as defined in the Register, is preserved or enhanced"**;
- Policy 22 Areas of Archaeological Evaluation, **which states "Where important archaeological remains are known to exist or may exist within an area for archaeological evaluation, the archaeological implications of development proposals shall be evaluated by qualified and independent Archaeologists before planning applications are determined. Planning permission will not be granted where the evaluation is deemed inadequate by the NPA in consultation with its archaeological advisor"**.

Assessment Methodology

- 11.9 The primary objective is to assess the impact of the development proposals on the historic environment. The aim is to make full and effective use of existing information in establishing the archaeological significance of the Application Site, to elucidate the presence or absence of archaeological material, its character, distribution, extent, condition and relative significance.
- 11.10 An archaeological assessment of the Application Site was undertaken by the Field Services Section of Clwyd-Powys Archaeological Trust, this report is included as Appendix 11.1. Following further consultations with the Heritage Officer (Archaeology) of the Brecon

Beacons National Park Authority, Clwyd Powys Archaeological Trust – Planning Services and Cadw this assessment was expanded to incorporate a larger study area (up to 1km from the Application Site boundary for non-designated assets, and up to 5km from the Application Site boundary for designated assets). The work includes a comprehensive assessment of regional context within which the archaeological evidence rests and aims to highlight any relevant research issues within national and regional research frameworks. This Assessment provides information of sufficient detail to allow informed planning decisions to be made which can safeguard the archaeological resource.

11.11 This assessment considers the following:

a) The nature, extent and degree of survival of archaeological sites, structures, deposits and landscapes within the study area through assessment of various readily available sources:

- The regional HER held by Clwyd-Powys Archaeological Trust;
- Information from Cadw on Designated archaeological sites;
- Assessment of all available and relevant excavation reports and archives including unpublished and unprocessed material;
- Assessment of aerial photographic (AP) and satellite imagery evidence;
- Assessment of archive records held at the County Archive and at the National Library of Wales (NLW);
- Records held by the developer e.g. bore-hole logs, geological/geomorphological information, aerial photographs, maps and plans;
- Map regression analysis using all relevant cartographic sources e.g. all editions of the Ordnance Survey County Series, Tithe and early estate maps (as available);
- Place-name evidence;
- Historic documents (e.g. charters, registers, estate papers).

b) The significance of any remains in their context both regionally and nationally, and in light of the findings of the desk-based study.

c) The history of the Application Site.

d) The potential visual impact of any proposed development on the setting of known sites of archaeological importance.

e) The potential for further work, with recommendations where appropriate for a suitable investigative and/or mitigation methodology.

- 11.12 The scoring system for assessing the magnitude of impact of the proposed development is based on the Design Manual for Roads and Bridges (Ref.12.1: DMRB, Volume 11 Environmental Assessment, Section 3 Environmental Topics, Part 2, Cultural Heritage), which is published by the UK Government on behalf of the Highways Agency, Transport Scotland, Welsh Assembly Government (Llywodraeth Cynulliad Cymru) and the Department for Regional Development Northern Ireland. DMRB is the established good practice guidance for assessing the impact of the effects of the Proposed Development on the cultural heritage resource, which it divides into three sub-topics: Archaeological Remains, Historic Buildings and Historic Landscapes.
- 11.13 Archaeological Remains are the materials created or modified by past human activities that contribute to the study and understanding of past human societies and behaviour. Archaeology can include the study of a wide range of artefacts, field monuments, structures and landscape features, both visible and buried. For the purposes of the [DMRB] guidance the sub-topic generally excludes historic buildings and historic landscapes, always accepting there may be important archaeological aspects to these sub-topics.
- 11.14 Historic buildings are architectural or designed or other structures with a significant historical value. These may include structures that have no aesthetic appeal, and the sub-topic includes, in addition to great houses, churches and vernacular buildings, some relatively modern structures, such as WWII and Cold War military structures, early motorway service stations, industrial buildings, and sometimes other structures not usually thought of as **'buildings', such as milestones or bridges**.
- 11.15 Historic Landscapes are defined by perceptions that emphasise the evidence of the past and its significance in shaping the present landscape. The definition encompasses all landscapes, including the countryside, townscapes and industrial landscapes as well as **designed landscapes, such as gardens and parks. As the whole of the UK's (and most of the world's) landscape has been modified by past human activities, it all has an historic character.** However, just as all old materials are not necessarily archaeologically significant merely by virtue of their age, so not all landscapes are equally historically significant.
- 11.16 As the area lies within Middle Usk Valley Landscape of Special Historic Interest (HLW (P) 7) the Historic Landscapes is assessed as part of an ASIDOHL2 study, included as an Appendix

11.2. ASIDOHL2 studies use a different set of assessment categories (Ref.11.2) to those recommended within the DMRB (Ref.11.1), therefore summaries of the ASIDOHL2 study are provided within this Assessment and the results are be cross-referenced with the DMRB categorises.

Table 11.1: Scale of values used in assessing the value/sensitivity of these various assets

Value / Sensitivity	Archaeological Remains	Historic Buildings	Historic Landscapes
Very High	World Heritage Sites Other Sites of international importance	World Heritage Sites Other Sites of international importance	World Heritage Sites & historic landscapes associated with them
High	Scheduled Ancient Monuments Undesignated assets of schedulable quality Assets of national importance that can contribute significantly to acknowledged national research objectives	Scheduled Monuments with standing remains Grade I and Grade II* Listed Buildings Other listed buildings that can be shown to have exceptional qualities Conservation Areas containing structures of clear national importance	Designated and undesignated historic landscapes of outstanding interest Designated special historic landscapes Undesignated landscapes of high quality, preservation and importance, and of demonstrable national value
Medium	Undesignated assets of regional importance that contribute to regional research objectives	Grade II listed buildings Unlisted buildings that have exceptional qualities Conservation Areas that contain buildings that contribute significantly to its historic character Historic Townscapes or built-up areas with important historic integrity in their buildings, or built settings	Landscapes of regional value Averagely well-preserved historic landscapes with reasonable coherence, time-depth or other critical factor(s)
Low	Assets of local importance Assets compromised by poor preservation or poor survival of contextual associations	Locally Listed buildings Historic buildings of modest quality Historic Townscapes or built areas of limited historic integrity	Robust undesignated historic landscapes Historic landscapes with importance to local interest groups Historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations
Negligible	Assets with little or no surviving archaeological interest	Buildings of no architectural or historical note	Landscapes with little or no surviving archaeological interest

Unknown	Importance not ascertained	Buildings with some hidden potential for historic significance	Importance not ascertained
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11.17 Magnitude of effect is assessed using the guidelines set out in the DMRB. This assessment is made without regard to the value of the resource, so the total destruction of a low value site is considered as the same magnitude of effect as the destruction of a high value asset. **The effect can be either 'direct' or 'indirect'. A direct effect is where there is a physical impact on a heritage asset, typically during the construction phase. Indirect is when there is a visual effect on the asset or its setting. In the broadest terms, the setting of an asset comprises the objects and conditions around it, and within which it is perceived; and in this sense all assets have settings. Not all settings, however, contribute to the value of the assets they encompass. The setting will be a combination of views, other historic features and their relationships to the asset, ambience (topography, vegetation, sound, and other sensual experiences) and context (what is known or thought about the asset, but not immediately experienced through the senses).**

Table 11.2: Scale of values used in assessing the magnitude of impacts

Magnitude of impact	Archaeological Remains	Historic Buildings	Historic Landscapes
Major	Change to most or all key archaeological materials, such that the resource is totally altered. Comprehensive changes to setting	Change to key historic building elements, such that the resource is totally altered Comprehensive changes to the setting	Change to most or all key historic landscape elements, parcels or components Extreme visual effects Gross change of noise or change to sound quality Fundamental changes to use or access resulting in total change to historic landscape character area
Moderate	Changes to many key archaeological materials, such that the resource is clearly modified Considerable changes to setting that affect the character of the asset	Change to many key historic building elements, such that the resource is significantly modified Changes to the setting of an historic building, such that it is significantly modified Considerable changes to a setting that affects the character of the asset	Changes to many key historic landscape elements, parcels or components Visual change to many key aspects of the historic landscape, noticeable differences in noise or sound quality, considerable changes to use or access resulting in moderate changes to

			historic landscape character
Minor	Changes to key archaeological materials, such that the asset is slightly altered Slight changes to setting	Change to key historic building elements, such that the asset is slightly different Change to setting of an historic building such that it is noticeably changed	Changes to few key historic landscape elements, parcels or components Slight visual changes to few key aspects of historic landscape, limited changes to noise levels or sound quality Slight changes to use or access resulting in limited changes to historic landscape character
Negligible	Very minor changes to archaeological materials, or setting	Slight changes to historic buildings elements or setting that hardly affect it	Very minor changes to key historic landscape elements, parcels or components Virtually unchanged visual effects, very slight changes in noise levels or sound quality, very slight changes to use or access resulting in a very small change to historic landscape character
No Change			

11.18 Significance of effect is assessed by combining the value of the resource and the predicted magnitude of change/ effect likely to arise, as per the matrix provided below, which is extracted from the DMRB (Ref.11.1, Vol.II, Sect.3, Pt.2, Chap.5 – Table 5.1).

Table 11.3: Significance of effect matrix.

VALUE/SENSITIVITY	Very High	Neutral	Slight	Moderate/ Large	Large or Very Large	Very Large
	High	Neutral	Slight	Moderate/ Slight	Moderate/ Large	Large or Very Large
	Medium	Neutral	Neutral/ Slight	Slight	Moderate	Moderate/ Large
	Low	Neutral	Neutral/ Slight	Neutral/ Slight	Slight	Slight/ Moderate
	Negligible	Neutral	Neutral	Neutral/ Slight	Neutral/ Slight	Slight
	No Change	Negligible	Minor	Moderate	Major	

	MAGNITUDE OF EFFECT
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- 11.19 For the purposes of the EIA (based on guidance in Welsh Office Circular 11/99 Environmental Impact Assessment, paragraphs 32-47) only moderate, moderate/ large, large/ very large or very large effects are considered significant.

Baseline Conditions

- 11.20 The Application Site and the Proposed Development are described in Chapters 3 (Application Site) and 4 (Proposed Development), please refer to the relevant Chapters for more detailed descriptions.

Previous Archaeological Studies

- 11.21 The area is included in the Middle Usk Valley Landscape of Special Historic Interest (HLW (P) 7) within the Register of Landscapes of Historic Interest in Wales (Ref.12.3). As such, the Application Site and the area around it have been assessed as they sit within Historic Landscape Character Areas 1172 Brecon and 1173 Llanddew. The area has also been assessed as part of LANDMAP, which includes an assessment of the Historic Landscape (Brecon - BRCKNHL121 & Llanddew - BRCKNHL694), based around the same boundaries and reasoning as the HLCAs (Ref.12.4).
- 11.22 Studies have been undertaken in association with the Proposed Development. These include a Cultural Heritage Assessment undertaken by Clywd-Powys Archaeological Trust. This study examined the potential for archaeological remains to exist on the Application Site and included a search area of 300m from the edge of the Application Site boundary. The results of the Assessment have been used to help inform this ES Chapter, however, a wider search area examining cultural heritage assets has been used for the preparation of this Chapter. This Assessment is included in Appendix 11.1.
- 11.23 A large number of other archaeological assessments and investigations undertaken in the wider area all relate to development and research undertaken within the historic core of the town of Brecon itself and are generally of limited value in relation to the specific development Application Site.

11.24 In addition, an ASIDOHL2 study was undertaken following a pre-planning recommendation from Brecon Beacons National Park Authority. This study examined the impact on the Historic Landscapes, and is included as an Appendix 12.2. The results of which are summarised and incorporated into this assessment.

Application Site, Monument, Building and Landscape Designations

11.25 In order to assess the historic environment, Scheduled Ancient Monuments (SAMs), Historic Parks and Gardens, Registered Historic Landscapes, Conservation Areas, and Listed Buildings were examined within 5km around the Proposed Development. This was subsequently reduced by utilising a Zone of Theoretical Visibility (ZTV) to assess the impact on these assets (Figure 11.1).

11.26 Within the 5km search area thirty SAMs were identified. None of these sites lie within the Application Site. Thirteen of these sites lie within the ZTV (Figure 11.2). These sites are considered to be of High value.

11.27 Within the 5km search area 649 Listed Buildings were identified. None of these sites lie within the Application Site. 412 of these sites lie within the ZTV, including eight Grade I listed buildings and 29 Grade II* listed buildings (Figure 12.2). These sites are considered to be of High value. The remaining Application Sites are Grade II listed buildings, considered to be of Medium value. 332 of the listed buildings within the ZTV also lie within the Brecon Conservation Area.

11.28 There are four Grade II listed historic Parks & Gardens within the 5km search area. None lie within the Application Site (Figure 11.3), one lies within the ZTV (Ffrwdgrech PO17), this site is considered to be of Medium value.

11.29 Brecon Conservation Area lies within the 5km search area, but the Conservation Area lies outside the Application Site. The area is drawn around the main historic centre of Brecon and contains a large number of listed buildings, just over half of the Conservation Area lies within the ZTV (Figure 11.3). This site is considered to be of High value.

11.30 The Application Site lies within the Middle Usk Valley Landscape of Special Historic Interest (HLW (P) 7). This area is divided into many individual Historic Landscape Character Areas (HLCA), which also encompass areas lying outside the limits of the registered Historic

Landscape. The Application Site largely lies within HLCA 1173 Llanddew, but also partly within HLCA 1172 Brecon. The Proposed Development was also considered to have a potential visual impact in HLCA 1171 Pen-y-Crug (Figure 11.3). These landscape areas are considered to be of High value, and are fully assessed within the accompanying ASIDOHL2 study.

11.31 Within 1km of the Application Site there are 730 unregistered Application Sites recorded in the regional Historic Environment Record (HER) (Figures 12.4 & 12.5). Four of these Application Sites lie within the Application Site; all of these finds date to the medieval and post-medieval periods recovered by metal detector (PRNs 117657, 119623, 120080 & 120082), these Application Sites are considered to be of Low value. Two further Application Sites were identified in the desk-based assessment (Hankinson 2015), relating to possible late post-medieval and modern agricultural buildings (PRNs 132205 & 132206), these are also considered to be of Low value. In addition the line of Cerrigcochion Road itself is thought to be the potential route of a Roman road (PRN 47027), a lack of positive evidence for this road means the value is Unknown, and Slwch Lane Holloway (PRN 132208) forms the southern boundary to the Application Site, considered to be of Medium value. Furthermore, an area of prehistoric or medieval field enclosures have been identified a short distance to the east of the Application Site during the course of the current assessment (CRB01), considered to be of Medium value.

Likely Significant Effects

Sources of Potential Direct Effects

11.32 The working practices during site preparation and construction (Short to Medium term) that have the potential to generate direct effects on heritage assets, and which have been considered in the Assessment, include:

- **Enabling works, such as installation of contractor's compound, construction of access roads, parking areas, storage areas, borrow pits and associated services;**
- Landscaping and terracing work;
- Topsoil stripping;
- Foundation excavation;
- Construction of roads and infrastructure;
- Service installation.

11.33 Without mitigation, the direct effects from these working practices would be permanent and irreversible

Sources of Potential Indirect Effects

11.34 Operational effects that have the potential to generate indirect effects on heritage assets, and which have been considered in this Assessment, include:

- Alteration to the visual setting or tranquillity of heritage assets; and
- **Alteration to the visual setting or tranquillity of the more holistic 'historic landscapes'.**

11.35 These are considered to be Long term indirect effects associated with the completed development.

Archaeological Remains

11.36 The assessment has determined that there are no designated archaeological remains within the Application Site.

11.37 Consultation of the regional Historic Environment Record, maintained by CPAT in Welshpool, has identified four find-spots within the Application Site. These include a 17th century cloth seal (PRN 117657), an Elizabeth I silver coin dated to 1574 (PRN 120080), a jetton of possible French origin from the 15th century (PRN 119623), and a silver coin of Henry III, probably dating to 1218-22 (PRN 120082). As chance find-spots that appear characteristic of casual losses, these finds are considered to be of Low value. Similarly as these finds have been removed then the development will result in No Change to these assets.

11.38 The assessment has identified two previously unrecorded assets at the northern end of the Development Area, comprising buildings of later 19th (PRN 132205) and 20th century (PRN 132206) dates (see also Figure 12.7). The field survey confirmed that there is no surface evidence for the buildings, other than heaps of rubble. As probable agricultural buildings of late post-medieval and modern date, which no longer survive, these features are considered to be of Low value. These features lie in an area that has been designated as the Employment site, it is likely therefore that these features will be adversely affected by

stripping and levelling works, and potentially by foundation excavations associated with the construction works, as well as altering the former agricultural setting associated with the completed development. Therefore the Proposed Development is considered to have a Major impact.

11.39 In addition the two routeways that form the western and southern boundary of the Application Site are of potential archaeological interest. Cerrigochion Road is believed to follow the route of a Roman Road (PRN 47027), and Slwch Lane is a holloway of possible medieval, and potentially earlier, origin (PRN 132208) that also functioned as the parish boundary marker. The route of the Roman road (PRN 47027) is unverified and therefore the value of this asset is Unknown. The Holloway (PRN 132208) is considered to be of Medium value. Cerrigochion Road (PRN 47027) will remain largely undisturbed by the Proposed Development, with the exception of the creation of the Application Site access and potential roundabout on the line of the road. This development affects only a small area of the total route of the road, and is therefore considered to have a Minor impact associated with the construction phase. Although bordering the Application Site, Slwch Lane (PRN 132208) will be maintained as is, and should not be directly affected by the Proposed Development, although the setting of this route will be altered with the completed development, which is considered to be a Negligible impact.

11.40 Further research has revealed an extensive area of enclosures (CRB01) in close proximity to the east of the Application Site (Figure 12.8). The provenance of these enclosures is currently unknown, but they may represent an area of medieval, or potentially prehistoric, activity and enclosure. They lie in close proximity to an Iron Age hillfort (Slwch Twmp hillfort PRN 611/SAM BR063), but the curvilinear nature of some of the enclosures are more reminiscent of medieval fields, possibly associated with the centrally located **St Alud/Eluned's Chapel (PRN 617), of reputed 5th century origin but which is also referred to in the early 12th century.** There is currently no evidence to suggest these features extend within the Application Site but there remains the potential for associated remains to survive below ground. These features are considered to be of Medium value. Due to the potential for associated remains to extend within the Proposed Development area, it is considered to have a Minor impact related largely to direct effects during the construction phase.

11.41 Further afield thirteen Scheduled Ancient Monuments have been identified within the ZTV that may be indirectly (visually) affected by the Proposed Development. A site visit has confirmed however that the majority of these sites will not be affected by the Proposed Development. BR004, BR022, BR150 and BR177 all lie within the urban area of Brecon, and that same urban development hides the Proposed Development from view, which will

therefore not affect either views from or of these monuments, neither will it affect the settings of these monuments. BR042, BR045, BR046, BR057, BR121, BR127 and BR196 all lie at some distance from the Proposed Development which will therefore have no impact on the settings of these monuments. Views to and from these monuments will also be shielded by intervening topography and vegetation cover, which will be present regardless of the time of year.

- 11.42 Only two SAMs have been identified that have a partial view of the Proposed Development area. 2.7km to the northwest lies Pen-y-Crug hillfort (BR063) which occupies a prominent hilltop location with extensive all-round views. The Proposed Development will be visible from the south-eastern side of this monument. As a Scheduled Ancient Monument this feature is of High value. The Proposed Development will not affect the setting of this monument, and due to the distance and surrounding tree cover it is considered to have a Negligible impact.
- 11.43 Slwch Twmp hillfort (BR038) lies approximately 380m to the southeast of the Proposed Development. The hillfort largely occupies south-easterly facing slopes, but elements of the Proposed Development may be visible from the western edge of the monument, dependent on leaf-cover of intervening trees. As a Scheduled site this asset is considered to be of High value. Despite the relative proximity, the Proposed Development will not impact upon any views of the monument. Views from the monument are largely focussed to the east and south, away from the development, with views of the development interrupted by tree-cover, therefore it is considered to have a Negligible impact.

Historic Buildings

- 11.44 No archaeological assets have been identified as Historic Buildings within the area of Proposed Development that may be either directly or indirectly affected. 412 Listed Buildings have been identified outside the area of Proposed Development, but within the ZTV, that may be indirectly affected by the completed development.
- 11.45 332 of these listed buildings lie within the Brecon Conservation Area, with a further 35 Listed Buildings lying outside the Conservation Area, but within the urban extent of Brecon. These buildings all lie within a relatively densely packed urban location, located largely along the main streets of The Street, High Street, Lion Street, Watton and Bridge Street, although with many other sites distributed throughout Brecon. The setting of this core of

historic urban activity will not be affected by the outlying Proposed Development, and due to the closely-packed housing most of these buildings have no visual relationship with the Application Site either.

- 11.46 There are few exceptions to this. Free Street lies at the bottom of Cerrigochion Road, and has views up the hill towards the Proposed Development area. Eleven Grade II listed buildings lie along Free Street (LB Nos. 6879, 6880, 6881, 6882, 85613, 85615, 85620, 85623, 85626, 85666 & 85744). As Grade II listed buildings they are considered to be of Medium value within the DMRB criterion. The view from these properties however is mainly east – west across the street, and does not encompass the Application Site, which is also largely shielded by high trees growing along its southern border. The impact is therefore considered to be Negligible.
- 11.47 The Cathedral Church of St John the Baptist (LB No.6998) occupies an elevated position to the west of the Application Site, although surrounded by tree cover. However, the Application Site would be visible from the tall tower of the church. As a Grade I listed building this asset is considered to be of High value. The Proposed Development will not affect the setting or views of this asset, and will only be visible from a small part of the building, therefore the impact is considered to be Negligible.
- 11.48 To the south and west a further collection of 21 listed buildings lie in Llanfaes and at Newton Farm. Those within Llanfaes itself have no visual relationship with the Application Site, as dense urban development blocks all views, and similarly views from Newton Farm are blocked by intervening urban development and tree cover, this is also the case for the farmstead of Fenni-fach on the banks of the Usk to the west. Further to the southwest lies a listed building on the A470 (LB No. 84513), consisting of a milestone with no visual relationship to the Application Site. Similarly a collection of buildings at Pont Ffrwd-grech lie at the base of west-facing slopes with no views towards the Proposed Development. Eight listed buildings lie in Llanspyddid to the west, but at such a distance that intervening buildings and trees hide the Proposed Development from view.
- 11.49 Two Grade II listed farm building form part of the farmstead of Pen-y-Lan (LB Nos. 6808 & 6809), which lie to the south of Brecon on elevated, north-facing, slopes. As a result these buildings have clear views over Brecon, which encompasses the hillside behind and the Application Site. These buildings are of Medium value, however the distance and relatively dense tree cover around the southern edge of the Application Site will both help to reduce any visual impact, which is considered to be Negligible.

- 11.50 To the north, Listed Buildings at Priory Mill (LB Nos. 6901 & 6902) and Forge House (LB No. 83494) all lie at the base of the steep Honddu valley, with no views of the Application Site. A collection of six listed buildings in Llanddew also have any view of the Application Site blocked by intervening building and vegetation cover. Closer to the Application Site, Fynnonau Cottage (LB No. 6867) is enclosed by dense tree cover, with intervening school buildings blocking any view of the Application Site.
- 11.51 Lower Pontgwilym, a Grade II listed farmhouse (LB No. 83681) of Medium value, lies to the north of Brecon but on gentle south-facing slopes giving clear views towards the town. Views of the Application Site are possible, as the hillslopes surrounding the nearby television relay mast are visible, but the development will be difficult to distinguish over such a distance and with surrounding tree cover. The impact on this Application Site is therefore considered to be Negligible.

Historic Landscapes

- 11.52 The Application Site lies within the Middle Usk Valley Landscape of Special Historic Interest (HLW (P) 7). This landscape is divided into a large number of Historic Landscape Character Areas (HLCAs). The Proposed Development lies partly within, and will have a direct impact on, two Historic Landscape Character Areas (HLCAs), that of HLCA 1172 Brecon, and HLCA 1173 Llanddew, and is considered to have an indirect (visual) impact on a further area, that of HLCA 1171 Pen-y-Crug.
- 11.53 The direct impact of the Proposed Development is described and assessed in the accompanying ASIDOHL2 study (Stage 2), which has six grades of impacts, ranging from Very Slight to Very Severe. These grades of impact do not necessarily equate with those used in the DMRB, so should not be considered as having values corresponding to similar terms used elsewhere in this ES (see 12.53 below).
- 11.54 The Proposed Development is graded as having a 'Moderate' direct impact on HLCA 1173 **Llanddew** and a 'Very Slight' direct impact on **HLCA 1172 Brecon**. The indirect (visual) impact on the same HLCAs is described and assessed in Stage 3, and is graded as having a 'Slight' impact on both HLCAs. The value of the HLCAs are described and assessed in Stage 4, again based on a six-point scale from Very Low to Very High, and HLCA 1172 is considered to be of 'High' value, **HLCA 1173 is considered to be of 'Moderate' value**.

- 11.55 The Proposed Development is considered to have an indirect (visual) impact on a one further HLCA, namely HLCA 1171 Pen y Crug. This is considered to **be of 'Considerable' value, and the impact is graded as 'Slight'**.
- 11.56 Converting the ASIDOHL2 study grades to those used in the DMRB guidance is not straightforward, as the ASIDOHL2 study uses calculations based on a wide range of criteria to determine the value of each individual HLCA. The DMRB provides more simplified criteria, with all areas being considered to be of High value as they lie within the registered Historic Landscape. In terms of the magnitude of impact the ASIDOHL2 study utilises six different grades of impact, based on a scoring system between 0 to 28. The DMRB effectively uses four different grades of impact (the fifth being No Change), which when divided into an equivalent scoring system suggests that the direct impact on HLCA 1173 Llanddew would be Minor, and on HLCA 1172 Brecon it would be Negligible. The indirect impact on HLCA 1173 Llanddew would be Minor, on HLCA 1172 Brecon it would be Negligible and on HLCA 1171 Pen-y-Crug it would also be Negligible.
- 11.57 Aside from the historic landscape character areas and registered Historic Landscape, one historic park and garden has also been identified as lying within the ZTV of the Proposed Development. Ffrwdgrech (PO17) is a Grade II listed historic parkland, listed as a well-preserved example of a Victorian pleasure ground with exceptionally fine tree planting. The landscaping is contrived to give fine views to the west. This parkland is considered to be of Medium value. The Proposed Development will have no impact on the setting of this parkland due to distance and tree cover. It may however be partially visible from elevated locations within the park boundary, the impact is however considered to be Negligible.

Impact Significance

Table 12.4: Summary of significance of impact on Archaeological Remains

Asset	NGR	Value	Magnitude of impact	Significance of impact
Find - Cloth seal, PRN 117657	SO 0510 2880	Low	No Change	Neutral
Find - French Jetton, PRN 119623	SO 05180 28906	Low	No Change	Neutral
Find - Elizabethan sixpence, PRN 120080	SO 05162 28866	Low	No Change	Neutral
Find - Silver penny Henry III, PRN 120082	SO 05125 28796	Low	No Change	Neutral

Un-named 19 th century building, PRN 132205	SO 05151 29048	Low	Major	Slight / Moderate
Un-named 20 th century building, PRN 132206	SO 05169 29028	Low	Major	Slight / Moderate
Cerrigochion Road, line of Roman road, PRN 47027	SO 0465 2843 to SO 0538 2995	Unknown	Minor	Slight
Slwch Lane Holloway, PRN 132208	SO 0497 2883 to SO 0532 2877	Medium	Negligible	Neutral / Slight
Medieval/Prehistoric enclosures, CRB01	SO 055 287	Medium	Minor	Slight
Pen-y-Crug Hillfort, SAM No. BR063	SO 0293 3036	High	Negligible	Slight
Slwch Twmp hillfort, SAM No. BR038	SO 0563 2842	High	Negligible	Slight

Table 12.5: Summary of significance of impact on Historic Buildings

Asset	NGR	Value	Magnitude of impact	Significance of impact
Listed Buildings along Free Street, LB Nos. 6879, 6880, 6881, 6882, 85613, 85615, 85620, 85623, 85626, 85666 & 85744.	SO 047 284	Medium	Negligible	Neutral / Slight
Cathedral Church of St John the Baptist, LB No.6998	SO 0444 2900	High	Negligible	Slight
Pen-y-Lan Farmhouse and farm building, LB Nos. 6808 & 6809	SO 0429 2740	Medium	Negligible	Neutral / Slight
Lower Pontgwilym, LB No. 83681	SO 0401 3040	Medium	Negligible	Neutral / Slight

Table 12.6: Summary of significance of impact on Historic Landscapes

Historic Landscape Character Area	Value		Magnitude of impact		Significance of Impact	
	ASIDOHL	Equivalent DMRB	ASIDOHL	Equivalent DMRB	ASIDOHL	Equivalent DMRB
HLCA 1172 Brecon	High	High	Very Slight - Slight	Negligible	Fairly Severe	Slight
HLCA 1173 Llanddew	Moderate	High	Moderate - Slight	Minor	Slight	Moderate / Slight
HLCA 1171 Pen-y-Crug	Considerable	High	Slight	Negligible	Slight	Slight

Table 12.7: Summary of significance of impact on registered Parks & Gardens of Historic Interest

Asset	Value	Magnitude of impact	Significance of impact
Ffrwdgrech (PO17)	Medium	Negligible	Neutral / Slight

Mitigation Measures

Measured incorporated into the design

- 11.58 Some mitigation measures for the Proposed Development have been incorporated into the scheme design. These measures include the retention of as much of the boundary vegetation as possible, reinforcing it, where necessary, to provide a strong planted framework for the development. A landscape buffer will be provided around the eastern, southern, and much of the western boundary of the Application Site. The massing and built form of the development, including the choice of materials and detailing, will be designed to respect and respond to the special qualities and context of the Brecon Beacons National Park. Full measures are shown on the Landscape Mitigation Plan enclosed within the full Environmental Statement document.

Measures to be Incorporated Through Detailed Design

- 11.59 The indirect (visual) impact of the Proposed Development on Slwch Lane Holloway (PRN 132208) and the two Scheduled Ancient Monuments of Slwch Twmp hillfort (BR038) and Pen-y-Crug hillfort (BR063) can be further limited through the proposed maintenance and reinforcing of the boundary vegetation.
- 11.60 The impact on identified Historic Building assets is largely confined to a limited indirect (visual) impact on a total of 15 Listed Buildings, 11 of which line Free Street in Brecon. These impacts are largely considered Negligible, but can be further reduced through the proposed maintenance and reinforcing of the boundary vegetation.
- 11.61 The impact on the Historic Landscape Character Areas is considered to be Slight to Moderate. As the Proposed Development will result in a change from the present agricultural land to one of largely urban and commercial development, mitigation to reduce this impact is limited. However, the retention of the existing boundaries around the development area will help to minimise any impact, and the stated intention to choose a layout, materials and details designed to respect and respond to the special qualities and context of the Brecon Beacons National Park will further serve to soften any impact on the historic landscape.

11.62 A potential slight visual impact on Ffrwdgrech historic parkland (PO17) to the south has been identified. Any impact could be removed through the proposed maintenance and reinforcing of the boundary vegetation along the southern edge of the Application Site.

Measures Through Controls on Construction

11.63 The Proposed Development is likely to have a direct impact on two sites, the former 19th and 20th century structures close to the northern end of the Application Site (PRNs 132205 & 132206). There are no above-ground remains, but there may potentially be below-ground remains. Preservation *in situ* is unlikely within the design proposals, therefore preservation by record may be appropriate, requiring further archaeological recording works. As the value of these sites is considered to be *Low*, an archaeological watching brief during construction works that may reveal or disturb below-ground deposits could be considered appropriate mitigation in this area.

11.64 The Application Site access arrangements are also likely to have a direct impact on the proposed line of a Roman Road (PRN 47027), the route now followed by Cerrigochion Road. Should remains of a Roman road be present, then there is the potential for these works to reveal and disturb any such remains. These could be recorded by means of an archaeological watching brief during construction works.

11.65 A previous archaeological assessment considered the current below ground archaeological potential across the Proposed Development to be Low. However, recently identified medieval or earlier enclosures (CRB01) lying to the east may potentially extend into the Proposed Development area. This potential could be assessed and recorded during construction works by means of an archaeological watching brief.

Residual Effects

Table 12.8: Residual impacts

Heritage Asset	Mitigation	Residual effects
Archaeological Remains		
Find - Cloth seal, PRN 117657	• No mitigation required	Negligible
Find - French Jetton, PRN 119623	• No mitigation required	Negligible
Find – Elizabethan sixpence, PRN 120080	• No mitigation required	Negligible

Find – Silver penny Henry III, PRN 120082	<ul style="list-style-type: none"> No mitigation required 	Negligible
Un-named 19 th century building, PRN 132205	<ul style="list-style-type: none"> Archaeological watching brief during any groundworks 	Minor
Un-named 20 th century building, PRN 132206	<ul style="list-style-type: none"> Archaeological watching brief during any groundworks 	Minor
Cerrigcochion Road, line of Roman road, PRN 47027	<ul style="list-style-type: none"> Archaeological watching brief during any groundworks 	Minor
Slwch Lane Holloway, PRN 132208	<ul style="list-style-type: none"> Maintenance and reinforcing of the boundary vegetation 	Negligible
Medieval/Prehistoric enclosures (archaeological potential), CRB01	<ul style="list-style-type: none"> Archaeological watching brief during any groundworks 	Minor
Pen-y-Crug Hillfort, SAM No. BR063	<ul style="list-style-type: none"> Maintenance and reinforcing of the boundary vegetation 	Negligible
Slwch Twmp hillfort, SAM No. BR038	<ul style="list-style-type: none"> Maintenance and reinforcing of the boundary vegetation 	Negligible
Building Remains		
Listed Buildings along Free Street, LB Nos. 6879, 6880, 6881, 6882, 85613, 85615, 85620, 85623, 85626, 85666 & 85744	<ul style="list-style-type: none"> Maintenance and reinforcing of the boundary vegetation 	Negligible
Cathedral Church of St John the Baptist, LB No.6998	<ul style="list-style-type: none"> Maintenance and reinforcing of the boundary vegetation 	Negligible
Pen-y-Lan Farmhouse and farm building, LB Nos. 6808 & 6809	<ul style="list-style-type: none"> Maintenance and reinforcing of the boundary vegetation 	Negligible
Lower Pontgwilym, LB No. 83681	<ul style="list-style-type: none"> Maintenance and reinforcing of the boundary vegetation 	Negligible
Historic Landscapes		
HLCA 1172 Brecon	<ul style="list-style-type: none"> Maintenance and reinforcing of the boundary vegetation Development design, including use of materials and details, in keeping with surrounding urban development 	Negligible
HLCA 1173 Llanddew	<ul style="list-style-type: none"> Maintenance and reinforcing of the boundary vegetation Development design, including use of materials and details, in keeping with surrounding urban development 	Minor
HLCA 1171 Pen-y-Crug	<ul style="list-style-type: none"> Maintenance and reinforcing of the boundary vegetation Development design, including use of materials and details, in keeping with surrounding urban development 	Negligible
Ffrwdgrech parkland, PO17	<ul style="list-style-type: none"> Maintenance and reinforcing of the boundary vegetation 	Negligible

Summary

11.66 This assessment incorporated and expanded upon a previous desk-based assessment undertaken by Clywd-Powys Archaeological Trust in 2015 (Appendix 12.1). This current assessment was undertaken using the scoring system for assessing the magnitude of impact

based on the Design Manual for Roads and Bridges (DMRB, Volume 11 Environmental Assessment, Section 3 Environmental Topics, Part 2, Cultural Heritage, Ref. 9-2). This divides the cultural heritage resources into three sub-topics: Archaeological Remains, Historic Buildings and Historic Landscapes.

- 11.67 Eleven assets were identified within the Archaeological Remains category that may be affected by the Proposed Development. There was considered to be a Major impact on two un-named buildings (PRNs 132205 & 132206), both of Low value, as below-ground remains may survive that could be affected during construction. This is considered to be a Slight to Moderate impact. There was considered to be a Minor impact on both a potential Roman road along Cerrigochion Road (PRN 47027) and a newly identified area of medieval or earlier enclosures that largely lie to the east (CRB01). There is the potential for below-ground remains of these site that, should they exist, may be disturbed during construction, considered to be a Slight impact. An archaeological watching brief would be considered appropriate mitigation to ensure preservation by record for all four of the above assets. Four further assets were identified (PRNs 117657, 119623, 120080 & 120082) within the site, but they will remain unaffected.
- 11.68 Slwch Lane Holloway (PRN 132208), of Medium value, and two Scheduled Ancient Monuments (BR063 & BR038), of High value, may be indirectly (visually) affected by the completed development. This impact is considered however to be Negligible, which can be further reduced through the maintenance and reinforcing of the boundary vegetation to reduce visual impacts.
- 11.69 Fifteen assets were identified within the Historic Buildings category, comprising Listed Buildings within and around Brecon, that may be indirectly (visually) affected by the completed development. All lie at sufficient distance and with limited views, therefore the impacts are considered to be Negligible. The significance of the impact is therefore considered to be Neutral to Slight, with the most significant impact (Slight) being on the Cathedral Church of St John the Baptist due to its Grade I listing and subsequent increased value. These impacts can be further reduced through the maintenance and reinforcing of the boundary vegetation.
- 11.70 The Application Site lies within the Middle Usk Valley Landscape of Special Historic Interest (HLW (P) 7). This impact is fully described and assessed in an accompanying ASIDOHL2 study (Appendix 12.2), but in summary the combined direct and indirect impact on HLCA

1172 Brecon is considered to be Negligible, the significance of which is considered to be Slight and the combined direct and indirect impact on HLCA 1173 Llanddew is considered to be Minor, the significance of which is considered to be Moderate to Slight. The impact on HLCA 1171 Pen-y-Crug is indirect only, which is considered to be Negligible, the significance of which is considered to be Slight. These impacts on the historic landscape may be further reduced through the maintenance and reinforcing of the boundary vegetation, alongside a considered development design, including the use of materials and details, which is in keeping with surrounding urban development and character of the landscape.

11.71 One Historic Park & Garden was also identified that may potentially be affected (Ffrwdgrech (PO17)). There is a potential Negligible indirect (visual) impact on this Site Site, the significance of which is considered to be Neutral to Slight. This can be further reduced through the maintenance and reinforcing of the boundary vegetation.

Table 11.9: Table of Significance – Archaeology and Heritage

Potential Effect	Nature of Effect (Permanent/Temporary)	Significance (Major/Moderate/Minor) (Beneficial/Adverse/Negligible)	Mitigation / Enhancement Measures	Geographical Importance*							Residual Effects (Major/Moderate/Minor) (Beneficial/Adverse/Negligible)	
				I	UK	W	R	C	D	L		
Construction												
Un-named 19 th century building, PRN 132205	Permanent	Adverse - Moderate	Archaeological watching brief during any groundworks							X		Adverse - Minor
Un-named 20 th century building, PRN 132206	Permanent	Adverse - Moderate	Archaeological watching brief during any groundworks							X		Adverse - Minor
Cerrigochion Road, line of Roman road, PRN 47027	Permanent	Adverse - Moderate	Archaeological watching brief during any groundworks				X					Adverse - Minor
Medieval/Prehistoric enclosures, CRB01	Permanent	Adverse - Moderate / Minor	Archaeological watching brief during any groundworks				X					Adverse - Minor
HLCA 1172 Brecon	Permanent	Adverse - Minor	Maintenance and reinforcing of the boundary vegetation Development design, including use of materials and details, in keeping with surrounding urban development			X						Negligible
HLCA 1173 Llanddew	Permanent	Adverse - Moderate	Maintenance and reinforcing of the boundary vegetation Development design, including use of materials and details, in keeping with surrounding urban development			X						Adverse - Minor
Completed Development												
Slwch Lane Holloway, PRN 132208	Permanent	Adverse - Moderate / Minor	Maintenance and reinforcing of the boundary vegetation				X					Negligible
Pen-y-Crug Hillfort, SAM No. BR063	Permanent	Adverse - Moderate	Maintenance and reinforcing of the boundary vegetation			X						Negligible
Slwch Twmp hillfort, SAM No. BR038	Permanent	Adverse - Moderate	Maintenance and reinforcing of the boundary vegetation			X						Negligible

Listed Buildings along Free Street, LB Nos. 6879, 6880, 6881, 6882, 85613, 85615, 85620, 85623, 85626, 85666 & 85744	Permanent	Adverse - Moderate / Minor	Maintenance and reinforcing of the boundary vegetation				X						Negligible
Cathedral Church of St John the Baptist, LB No.6998	Permanent	Adverse - Moderate	Maintenance and reinforcing of the boundary vegetation			X							Negligible
Pen-y-Lan Farmhouse and farm building, LB Nos. 6808 & 6809	Permanent	Adverse - Moderate / Minor	Maintenance and reinforcing of the boundary vegetation				X						Negligible
Lower Pontgwilym, LB No. 83681	Permanent	Adverse - Moderate / Minor	Maintenance and reinforcing of the boundary vegetation				X						Negligible
HLCA 1172 Brecon	Permanent	Adverse - Minor	Maintenance and reinforcing of the boundary vegetation Development design, including use of materials and details, in keeping with surrounding urban development			X							Negligible
HLCA 1173 Llanddew	Permanent	Adverse - Moderate	Maintenance and reinforcing of the boundary vegetation Development design, including use of materials and details, in keeping with surrounding urban development			X							Adverse - Minor
HLCA 1171 Pen-y-Crug	Permanent	Adverse - Minor	Maintenance and reinforcing of the boundary vegetation Development design, including use of materials and details, in keeping with surrounding urban development			X							Negligible
Ffrwdgrech (PO17)	Permanent	Adverse - Moderate / Minor	Maintenance and reinforcing of the boundary vegetation				X						Negligible

* Geographical Level of Importance

I = International; UK = United Kingdom; W = Wales; R = Powys; C = BBNPA ; D = Brecon; L = Immediate surroundings to Application Site

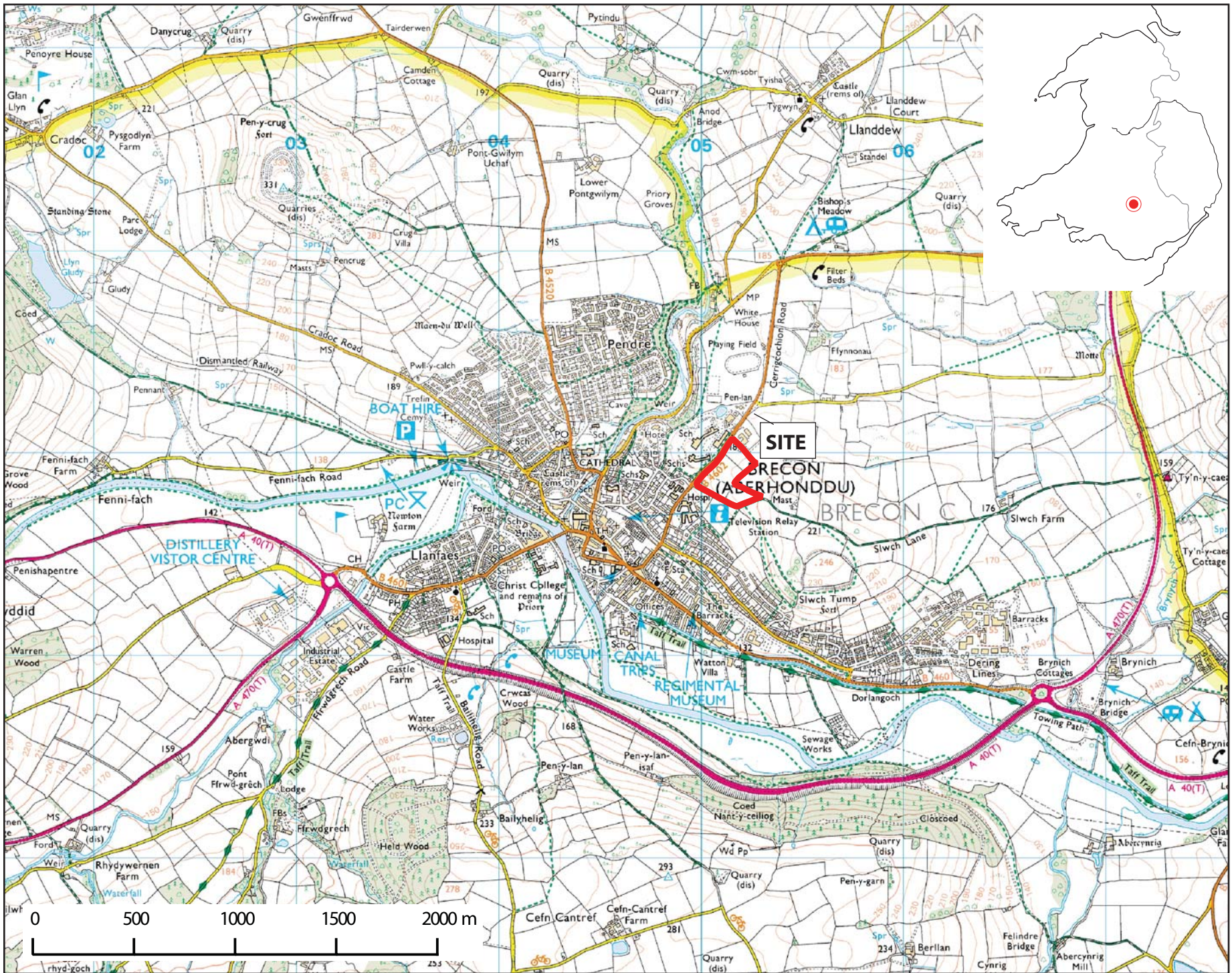


Figure 1: Site location plan.
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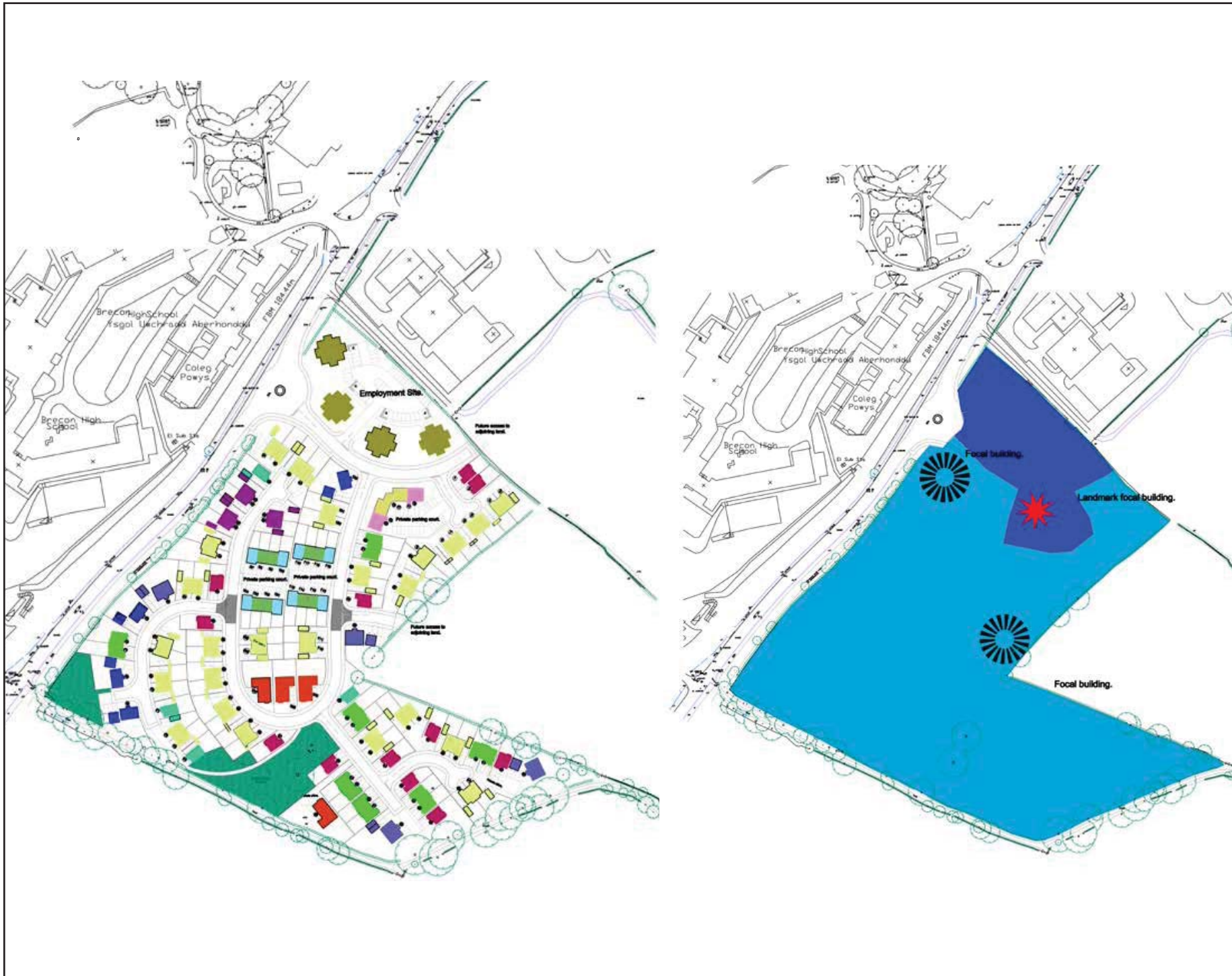


Figure 2: Outline proposed site development plans, showing a proposed layout of buildings and open spaces on the left, and building heights on the right.

Taken from the Development Brief (Barton Willmore 2015)

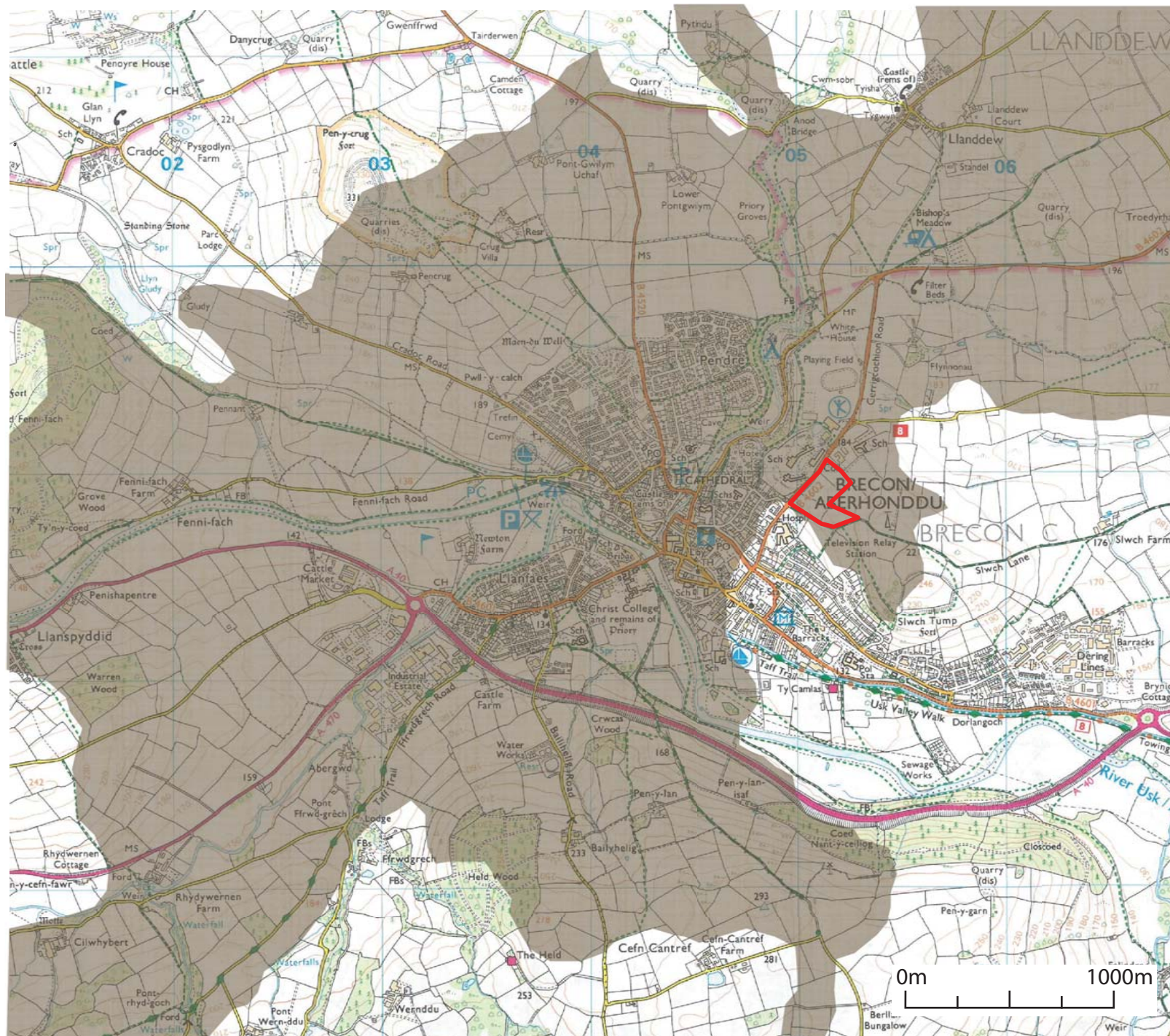
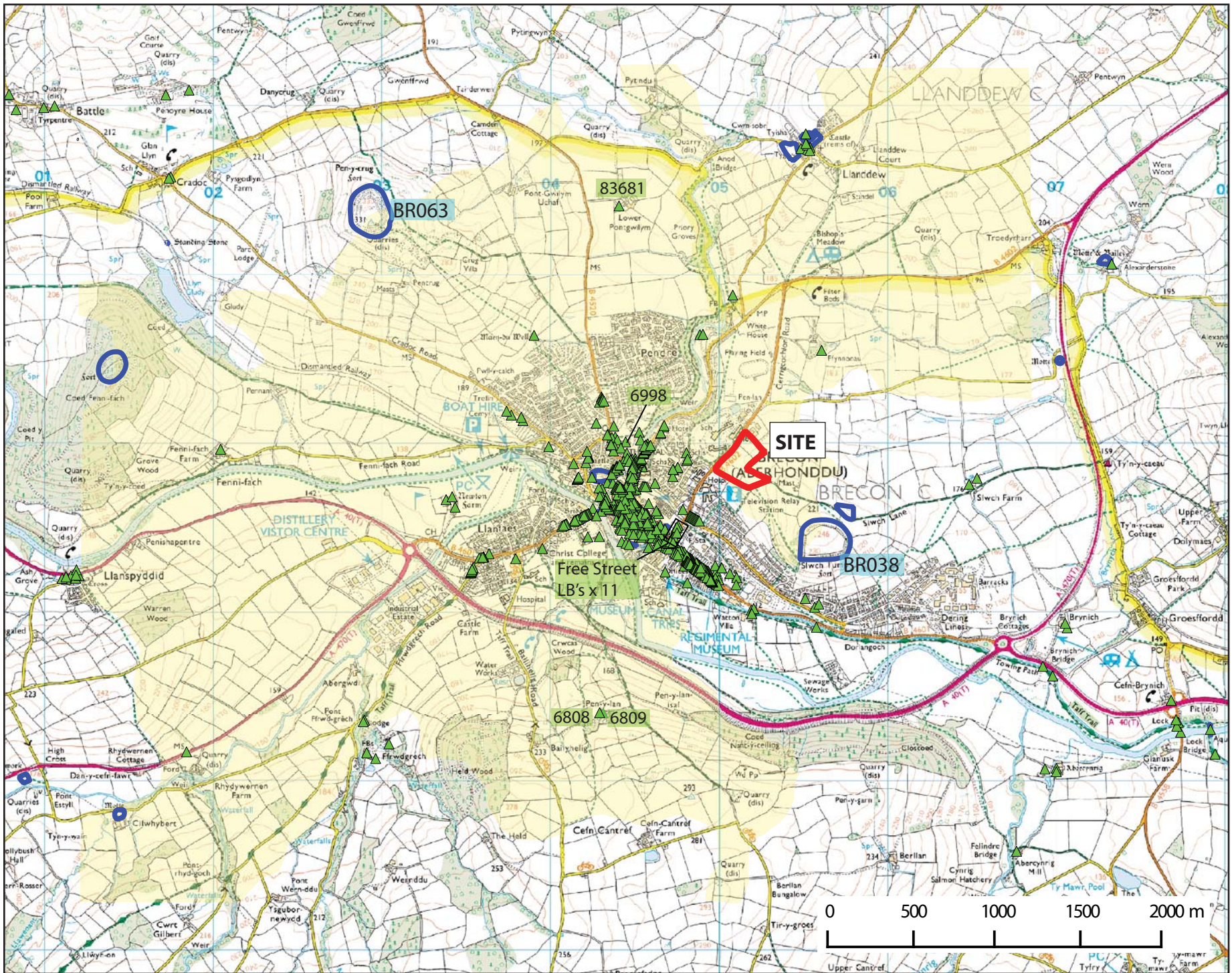


Figure 12.1: Zone of Theoretical Visibility (ZTV), based on a 'bare earth' model, not taking into account screening features such as trees, hedgerows and buildings.

Map provided by Barton Willmore, 2016

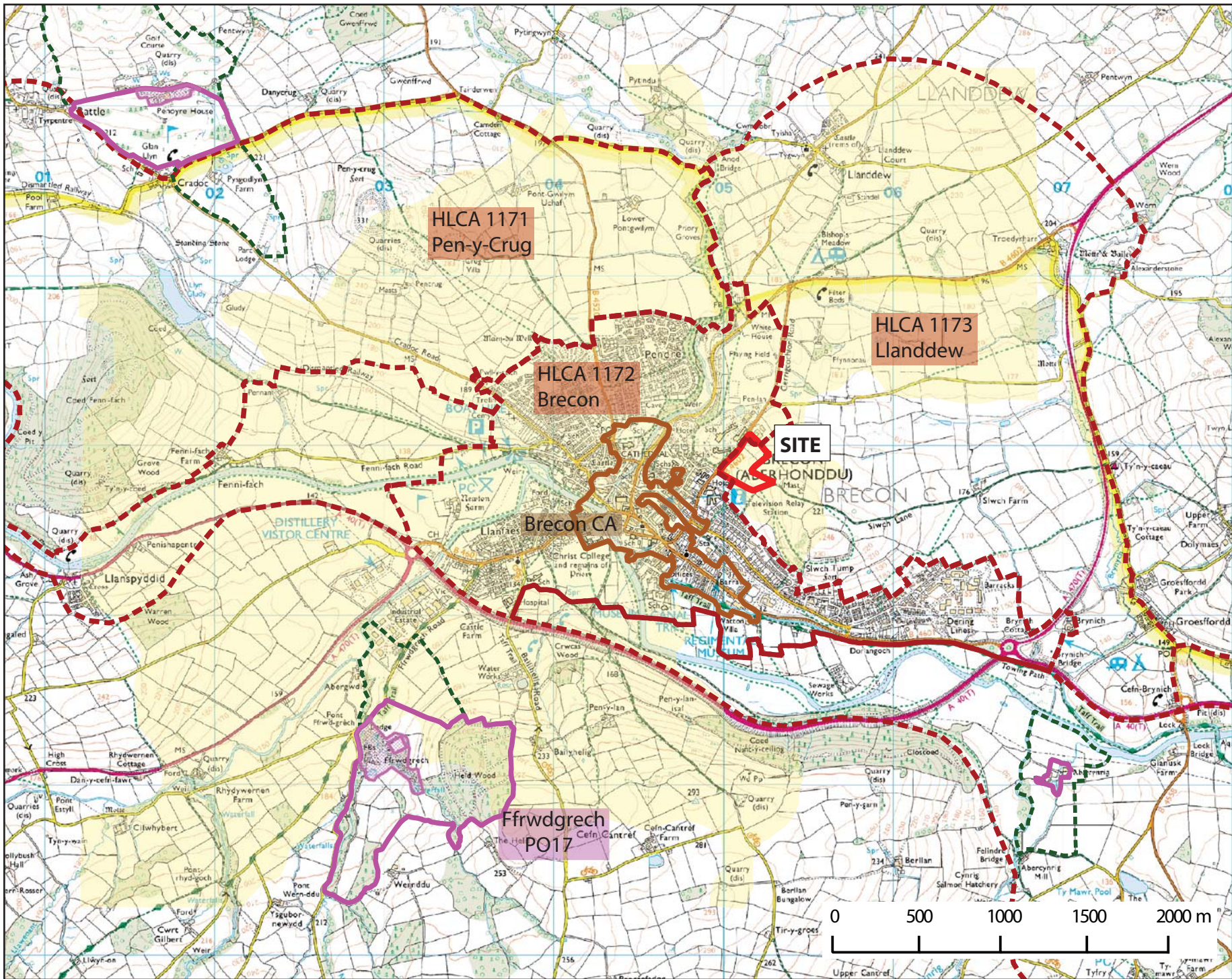


- Extent of ZTV
- Scheduled Ancient Monument
- Listed Building

Figure 12.2: Designated archaeological sites within the ZTV (SAMs & LBs). Sites referenced in the text are labelled.

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- Extent of ZTV
- Historic Landscape Character Area
- Brecon Conservation Area
- Registered Historic Parkland
- Essential setting

Figure 12.3: Designated archaeological areas within the ZTV (HLCAs, Conservation Areas, registered Parkland). Sites referenced in the text are labelled.

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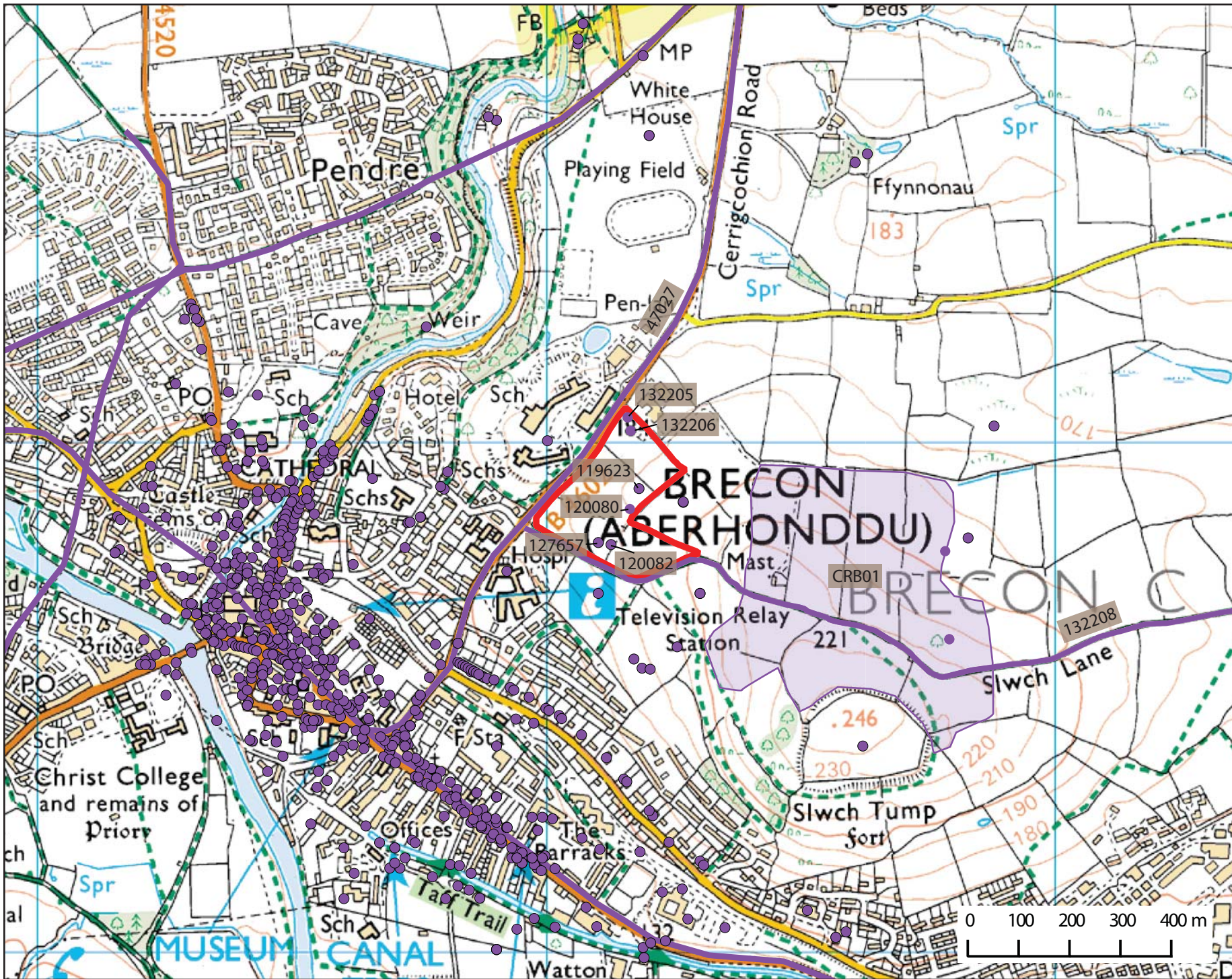


Figure 12.4:
Archaeological sites
within a 1km radius
of the proposed
development area.
Sites discussed in the
report are labelled by
PRN or reference no.

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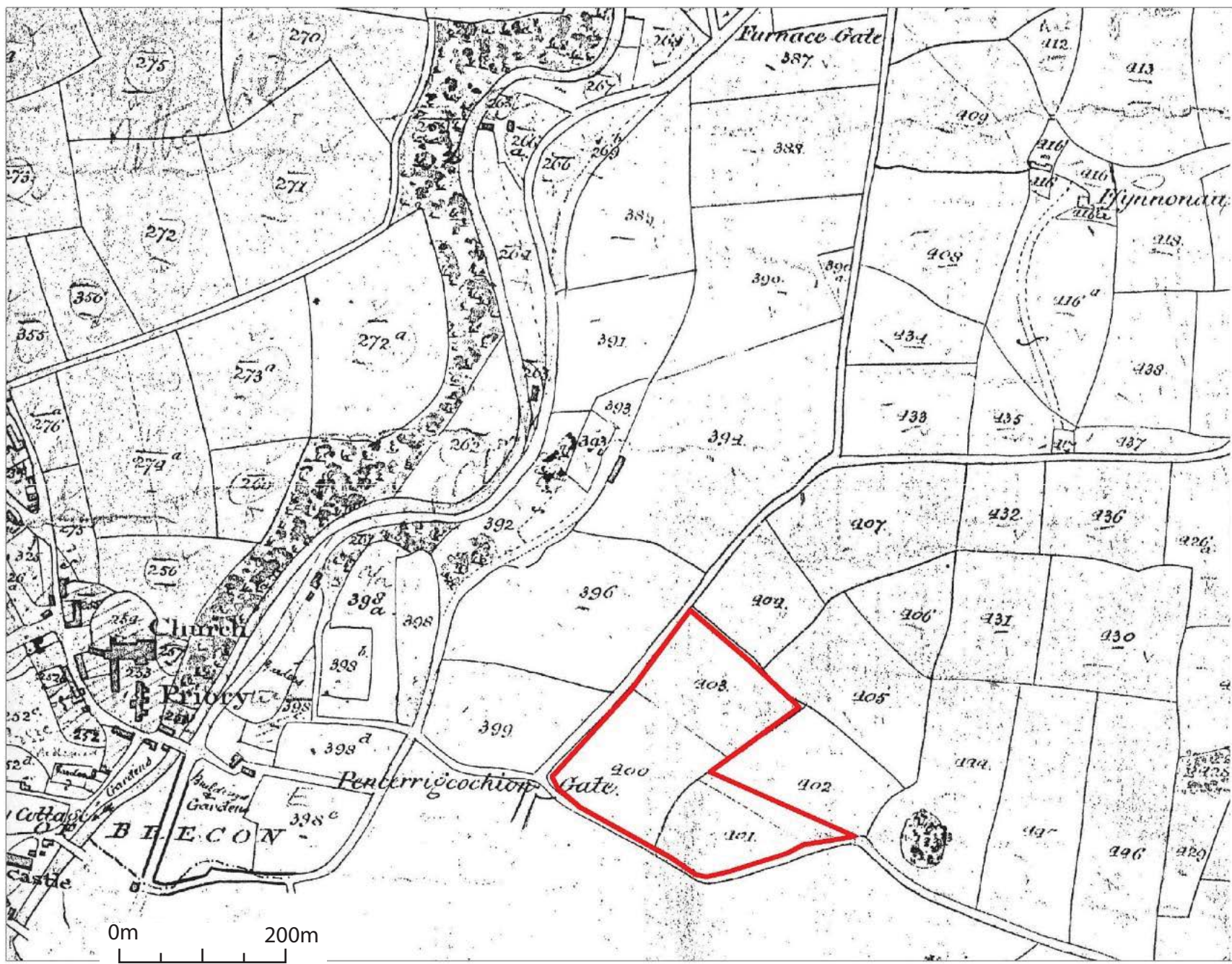


Figure 12.6: Parish tithe map of 1838/9. Site boundary shown in red.

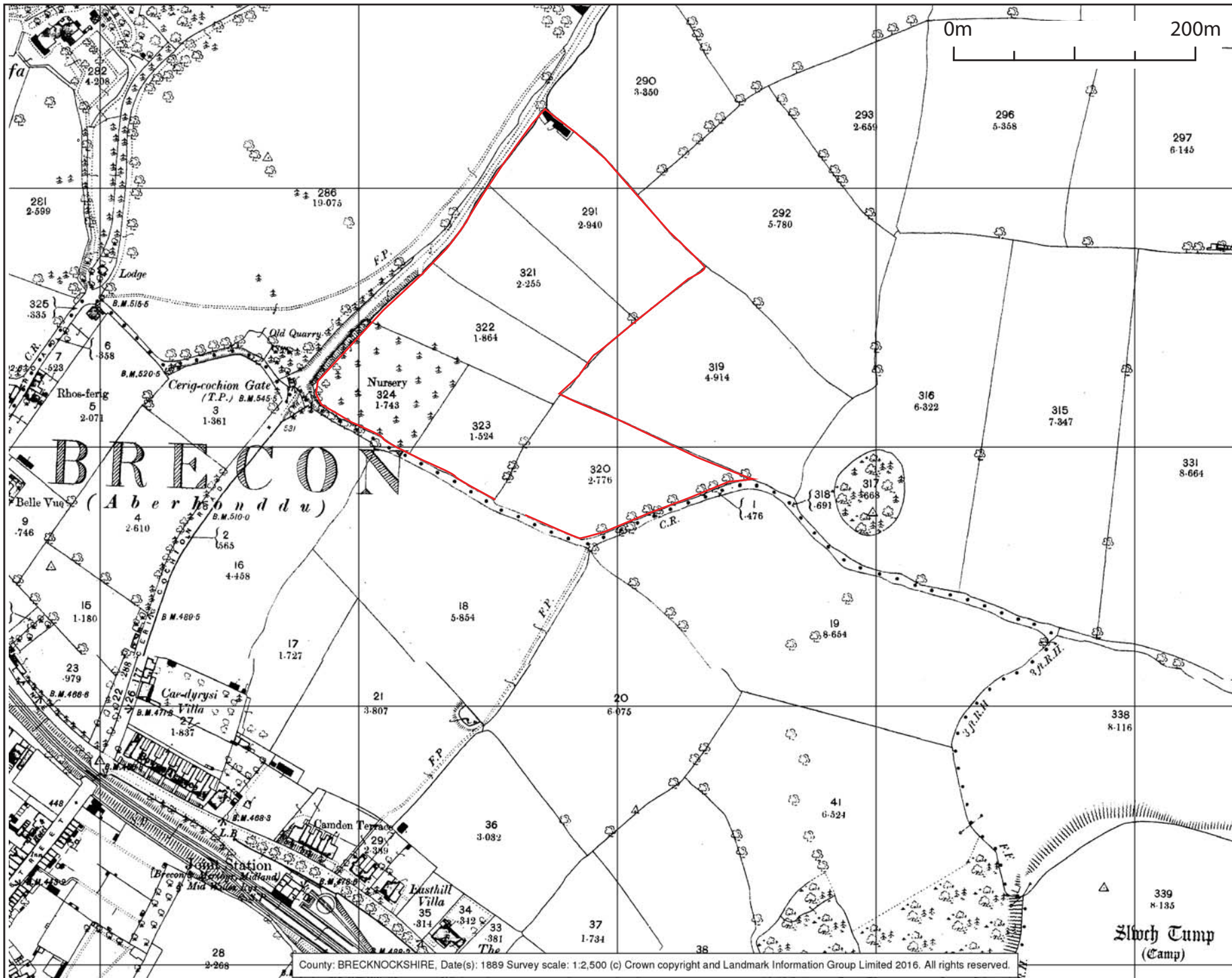


Figure 12.7:
Ordnance Survey
1st edition 1;2500
map of 1891.
Site outline in red.

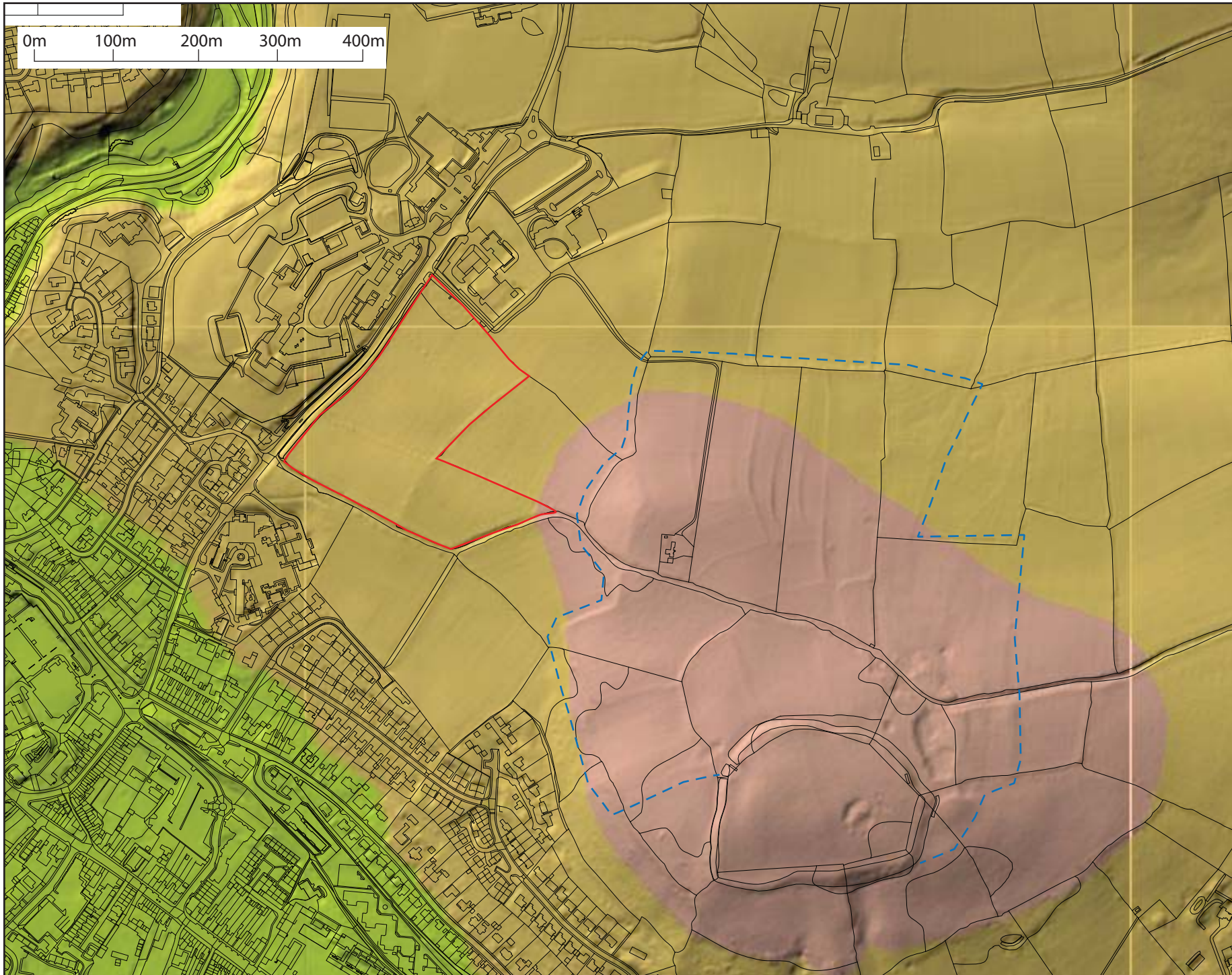


Figure 12.8: Lidar DTM data at 2m resolution, overlaid with current boundaries. Site boundary shown in red. Approximate area of earlier enclosure contained within the blue dotted line.

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Archaeology Wales

Archaeology Wales Limited

The Reading Room, Town Hall, Great Oak Street,
Llanidloes, Powys SY18 6BN

Tel: +44 (0) 1686 440371

Email: admin@arch-wales.co.uk

Company Directors: Mark Houlston MIFA & Jill Houlston
Company Registered No. 7440770 (England & Wales).
Registered office: Morgan Griffiths LLP, Cross Chambers,
9 High Street, Newtown, Powys, SY16 2NY