



Ymddiriedolaeth Gerddi Hanesyddol Cymru  
Welsh Historic Gardens Trust

13.09.2019

Dear Ms Law,

**19/0938/FUL Frochas Farm, Frochas, Welshpool, Powys SY21 9JD.**

**Proposed Erection of a broiler installation and silos, formation of a vehicular access and associated works**

The Welsh Historic Gardens Trust is grateful to have this opportunity to comment on the above planning application. The Welsh Historic Gardens Trust (WHGT) is a conservation and heritage organisation set up to protect and conserve historic gardens and park landscapes of Wales. Its aims include the promotion of the restoration and conservation of parks and gardens which are of special historic interest in Wales and to research and document the garden history of Wales. WHGT is recognised by Cadw and by local planning authorities as the only conservation body in Wales routinely consulted on planning applications affecting historic parks and gardens and their settings, including registered sites, in effect the acting non-statutory consultee for planning applications affecting listed historic parks and gardens in Wales.

We note that the application is covered by the Environmental Impact Assessment Regulations. The scale and nature of the proposed development mean that it falls within Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 making a full environmental impact assessment (EIA) mandatory.

The site of the current application lies immediately outside the area defined as the essential setting of the important Grade II\* registered landscape of Llanerchydol Hall. The park is described in the Powys Register of Parks and Gardens for Wales as a fine and largely intact example of early nineteenth-century park in an outstandingly picturesque location. Its Grade II\* designation places it in the top third of registered designed landscapes in Wales.

With the evidence currently available to us we would recommend refusal of this planning application. We are concerned that relevant guidance on a number of aspects of impact assessment have either been overlooked or misinterpreted leading to a lack of understanding of, and underestimation of, the effects of this proposal on the open rural landscape of this part of Powys and the Registered Park of Llanerchydol in particular.

The submitted Landscape and Visual Impact Assessment (LVIA) includes the statement below:

The methodology used in this study conforms to the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3). GLVIA3 recommends that for non-EIA development, the assessment should be proportionate to the scale of the project and the nature of its likely effects and that an assessment of significance is not required.

As mentioned above, however, the application is an EIA development and the statement does not explain why the LVIA lacks detail on several key elements – for instance Zone of Theoretical Visibility (ZTV) of the proposal. This is widely mentioned but never clearly presented in the text as a figure, only as a rough area on a photograph, with little description of how this was determined (details of software used, etc). The photomontages as presented in the text are of low resolution and poor quality, making a realistic judgement on visual and landscape impact difficult.

With regard to viewpoint analysis, the submitted LVIA states:

#### **Viewpoint Analysis**

19. A detailed description of the six landscape and visual viewpoints and the potential changes that would occur through the introduction of the proposed development are contained below. It is important to note that the viewpoints were photographed in February 2018, and they cover varying horizontal widths of view and so no set viewing distance should be ascribed to individual views. The viewpoint images are provided for information purposes and are labelled with relevant notes and should not be considered as a substitute to visiting a viewpoint in the field.

It is regrettable that the above approach has been taken and that best practice for the selection and illustration of viewpoints as set out in the Guidelines for Landscape and Visual Impact Assessment 3 has not been followed.

The location of each viewpoint should be clearly marked on a plan giving all the data needed to find and replicate those locations. The labelling and descriptions of where to find each viewpoint figure are confusing – e.g. ‘The viewpoints are listed below and their locations are shown on LV1 and LV2’

It is also regrettable that there has been no attempt to analyse sequential views of the proposed development from the rights-of-way network, which includes the National Trail of Glyndwr’s Way. Neither has an assessment been made of its cumulative impact taken in conjunction with, as is stated in the LVIA, other agricultural buildings already existing in its vicinity, notably the existing agricultural buildings and the polytunnels at Dingle Nursery.

We recommend a fuller and more rigorous use of the LANDMAP data by the applicants and their consultants to help understand the landscape effects of the proposal. Powys Local Development Plan (2011-2026) Supplementary Planning Guidance on Landscape adopted April 2019 provides clear and relevant guidance on the use of LANDMAP in landscape appraisal and includes good definitions of both

cumulative impact and grouping within the rural landscape. This guidance was adopted before the application was submitted.

In similar vein Cadw's advice on 'Managing Change to Registered Historic Parks and Gardens in Wales' states clearly:

'Before preparing a planning application, you should consider the impact of the proposed development on the registered historic park or garden, and its setting, ... When you submit an application for development which is likely to have an impact on a registered historic park or garden, or its setting, we strongly recommend that you include a heritage impact statement with your supporting documents (see section 2.2).'

We recognise that some historic landscape assessment has been undertaken but the same comments apply as to those made on the landscape and visual assessments – i.e. that the amount and quality of information and analysis falls short of that expected in the assessment of a proposal requiring a full EIA.

We hope you find these brief comments of assistance.

Yours sincerely



Sarah Green

WHGT Planning and Conservation Advisor