

Heritage Statement – Wat's Dyke Scheduled Monument

Land at New Brighton Road

13/06/2019



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1. INTRODUCTION

BACKGROUND

1.1. Neo Environmental Ltd has been appointed by Hourigan Connolly on behalf of Stewart Milne Homes (North West England) Limited (the "Applicant") to undertake a Heritage Statement aimed at assessing potential visual impacts on a nearby Scheduled Monument as a result of a proposed residential development. This development will consist of 92 dwellings and associated works within Land South of New Brighton Road, New Brighton, Mold, Flintshire, CH7 6RB. Please refer to **Appendix D** for the layout of the Proposed Development.

SITE DESCRIPTION

- 1.2. The area of the proposed development (the "Application Site") comprises two fields; a larger field within the eastern section and a smaller field within the western section. Both fields have been previously used for agriculture but are currently under knee-height grass with some sedges (see Photos 1 6: Appendix B).
- 1.3. Access to the Application Site is via New Brighton Road along its northern boundary. The site itself is centred approximately on National Grid Reference (NGR) E325199 N365545 and lies at an elevation of approximately 142 148m AOD. The site comprises 3.37ha and defines the northern extent of the village of New Brighton. Field boundaries consist primarily of hedgerow (1.5 2m high) with infrequent trees.

SCOPE OF THE ASSESSMENT

- 1.4. This Heritage Statement assesses the significance and sensitivity of the Scheduled Monument recorded as "Wat's Dyke: Section N & E of New Brighton" (FL085) and assess potential impacts upon the setting of this monument as a result of the proposed residential development. This assessment has been produced in response to a request from Cadw, the historic environment service of the Welsh Government, who have requested *"an assessment of the impact of the proposed development on the setting of the scheduled monument, prepared in accordance with the methodology outlined in the Welsh Government's best-practice guidance"* (Appendix C).
- 1.5. The report is supported by the following Figures and Technical Appendices:
 - Appendix A: Figures



- Figure 1 Site Location and Wat's Dyke Scheduled Monument
- Appendix B: Photographs
- Appendix C: Cadw Response
- Appendix D: Proposed Site Layout

STATEMENT OF AUTHORITY

- 1.6. The assessment has been conducted by registered archaeologists with the Chartered Institute for Archaeologists (CIfA), of Associate (ACIfA) level or above and/or members of the Institute of Archaeologists of Ireland (IAI). The assessment has been conducted in accordance with the appropriate professional guidance outlined in the CIfA Codes of Professional Conduct and in line with the methodology outlined in the Welsh Government's best-practice guidance Setting of Historic Assets in Wales (2017).
- 1.7. Michael Briggs BSc (Hons) MSc ACIfA MIAI has undertaken a large number of cultural heritage and archaeological impact assessments for developments across the UK and Ireland, with a particular focus on renewable energy and residential projects. This experience has included the initial stages of feasibility and heritage impacts through to any final mitigation measures required for each site, such as geophysical surveys and trial trenching.



2. ASSESSMENT METHODOLOGY

2.1. The desk-based assessment was conducted to assess the significance and sensitivity of the section of the Wat's Dyke Scheduled Monument in close proximity to the Application Site. Relevant records were accessed through Cadw, Coflein and the local Historic Environment Record, while historic maps were consulted via the National Library of Scotland. The location of the monument was ascertained through using GIS layers obtained via the aforementioned sources. The location of the monument and the Application Site are presented on **Figure 1** (Appendix A).

ASSESSMENT OF INDIRECT IMPACTS

- 2.2. The significance of the monument is assessed using the DMRB criteria (listed below in Table 1). Impacts are then assessed based on the significance and sensitivity of the monument, as well as to what extent visibility and intervisibility are expected to be possible between the monument and the Proposed Development. Impacts are assigned on the following scale, where an indirect impact of 'moderate' or above is considered to be a significant impact and would require mitigation measures:
 - Major
 - Major to moderate
 - Moderate
 - Moderate to low
 - Low
 - Low to negligible
 - Negligible



	Assessment Considerations			
Significance	Archaeological Remains	Historic Buildings	Historic Landscapes	
Very High	 World Heritage Sites Assets inscribed as of universal importance Assets that can contribute substantial knowledge to international research 	 World Heritage Sites Structures of recognised international importance 	 World Heritage Sites Historic landscapes of international historic value 	
High	 Scheduled Monuments (SMs) Monuments or places of clear national importance Heritage assets that contribute to national research objectives 	 SMs which incorporate standing remains Some Listed Buildings that have exceptional historic or architectural qualities or associations not adequately reflected in their listing Some Conservation Areas containing very important buildings 	 Historic Gardens and Designed Landscapes (HGDL) of outstanding interest Historic landscapes of demonstrable national value 	
Medium	 Monuments or places that contribute to regional research objectives SMs compromised by poor preservation or poor survival of contextual associations 	 Listed Buildings of regional importance Buildings containing exceptional qualities in their fabric or historical associations Conservation Areas containing buildings important to its historic character Historic townscapes with important historic integrity in their buildings or settings 	 Historic landscapes or HGDL of particular interest Undesignated historic landscapes showing quality justifying designation 	

Table 1: Grading of the Significance of Cultural Heritage Resources Based on DMRB 2009¹



 $^{^{1}}$ Highways Agency (2009) Design Manual for Roads and Bridges. Highways Agency.

Low	 Monuments or places of local importance Assets compromised by very poor preservation or survival of contextual associations Assets with potential to contribute to local research objectives 	 Listed Buildings of local importance Historic buildings of modest fabric or historical association Historic townscapes of limited integrity features within urban areas 	 Historic landscapes or HGDL of local interest Historic landscapes whose value is limited by poor preservation or survival of contextual associations
Negligible	 Assets with little or no surviving evidence 	 Buildings of no architectural or historical note 	Landscapes with little or no historic interest

SITE VISIT

2.3. A walkover survey was conducted at the Application Site on 10th June 2019. The primary aim of the survey was to assess the potential for visibility and intervisibility between points within the Application Site and points within the curtilage of the Scheduled Monument. This was done by undertaking a photographic survey from key points to illustrate this visibility. The locations of the photographs taken are presented on **Figure 1 (Appendix A)** while **Appendix B** contains the photographs themselves along with their descriptions and directions.

ASSESSMENT LIMITATIONS

2.4. Views and effects were carefully assessed, but restrictions due to not having access to private lands partially limited the assessment. While the western section of the Scheduled Monument was publicly accessible due to its proximity to a Public Right-of-Way (PROW), the eastern section is located within private land and could not be accessed for a full on-site appraisal. The Application Site itself was fully accessible.

THE IMPORTANCE OF SETTING

- 2.5. Setting can be important to the way in which historic assets or places are understood, appreciated and experienced.
- 2.6. Where development is proposed it is important to identify and define the setting of the heritage asset and to assess how development might impact upon this resource. Setting often



extends beyond the property boundary, or 'curtilage', of an individual historic asset into a broader landscape context. Less tangible elements can also be important in understanding the setting. These may include function, sensory perceptions or the historical, artistic, literary and scenic associations of places or landscapes. In the light of this guidance, development proposals should seek to avoid or mitigate detrimental impacts on the settings of historic assets.



3. IMPACT ASSESSMENT

WAT'S DYKE: SECTION N & E OF NEW BRIGHTON (FL085)

- 3.1. Wat's Dyke comprises the remnants of a linear bank and single ditch feature constructed in the late 8th century or early 9th century. Overall Wat's Dyke formed a boundary approximately 40 miles long with sections of varying degrees of survival. It was suggested by Sir Cyril Fox, during his initial survey of Wat's Dyke in 1934, that the boundary was not continuous but was rather a fragmented group of earthworks designed to 'plug' the gaps between natural boundary features such as rivers and marshes. However, it is not clear to what extent the fragmented nature of the boundary, as it currently exists, is due to this reason and to what extent it is the result of post-medieval clearance and development².
- 3.2. Wat's Dyke runs largely parallel and in relative proximity to Offa's Dyke and, as such, is likely to share a similar function. Offa's Dyke marked the western boundary of Mercia during this time period and was likely constructed to define the western extent of Mercia as well as provide a defensive function. As the ditch of Wat's Dyke is located on the west side of the bank, this boundary was therefore designed to protect from incursions from Wales. It is theorised that Wat's Dyke may therefore have been constructed in the 820s when Coenwulf was fighting against a resurgent Welsh threat (Cyngen in Powys and Rhodri Mawr "the Great" in Gwynedd)³.
- 3.3. This particular Scheduled Monument comprises the section of this boundary to the north and east of New Brighton. The following entry is a report on this monument within the Cadw database⁴:

"The monument consists of a linear earthwork, a substantial bank and ditch forming a major boundary between two adjacent landholdings, and of presumed AD 8th century date. At the northern end, (north of the present Bryn Offa) a section of the bank is well preserved. A section 250yds long also survives to the south of Tenant Farm, with a low bank visible in the orchard. To the south the hedge joins the line of the bank and a footpath follows the line of the ditch. Here the bank stands 5-6ft above the ditch. Another section measuring 380yds long to the north of Mynydd Bychan has a 3-4ft high bank, which stands 6-8ft above the ditch. To the south of Bryn Offa Farm the bank is high and in good condition. The western ditch is a pool and beyond this is well preserved, with the scarp measuring 21ft at one point."

3.4. This section of Wat's Dyke therefore comprises considerable above ground remains and is considered to be of **high (national) significance** as per the DMRB criteria listed in **Table 1**. Its

⁴ Last accessed 12/06/19 at http://cadwpublic-api.azurewebsites.net/reports/sam/FullReport?lang=en&id=642



² Worthington, M (1997) Wat's Dyke: An Archaeological and Historical Enigma, *in Bulletin John Rylands Library, Manchester, Vol 79, no. 3.*

³ Pitts, M (2007) Wat's Dyke Dated: Was it Coenwulf's Dyke? *In British Archaeology, Issue 97.*

primary archaeological value is derived from its potential for sub-surface features and deposits. However, the monument also derives importance from its setting, particularly to its western side, due to its function as a defensive rampart against incursion from this direction. As such, the monument and its setting are considered to be **potentially sensitive to visual impacts**.

3.5. Due to its significance and sensitivity, Cadw have requested "an assessment of the impact of the proposed development on the setting of the scheduled monument, prepared in accordance with the methodology outlined in the Welsh Government's best-practice guidance" (Appendix C).

ASSESSMENT OF INDIRECT IMPACTS ON SETTING

- 3.6. The proposed development may have the potential to indirectly impact on the setting of the Scheduled Monument if it is considered to interrupt views in this direction from the monument, or if views of the proposed development may detract from the heritage value of its setting.
- 3.7. During the site visit, photographs were taken from various key points within and around the Application Site and Wat's Dyke, particularly those associated with the Public Right-of-Way (PROW) that runs through the Application Site and alongside part of the monument. The location of these photos is presented within **Figure 1 (Appendix A)** and the photos and their descriptions are contained within **Appendix B**. The aim of the site visit was to ascertain to what extent visibility and intervisibility may be possible between the proposed development and the Scheduled Monument.
- 3.8. Visibility to the north from within the Application Site was identified to be significantly restricted by the presence of woodland along the northern side of New Brighton Road, even from the highest points of the land (Photos 4 6). As such, no views or intervisibility was identified to be possible with the majority of the Scheduled Monument. This was confirmed by visiting the section of the monument adjacent to the PROW. This section retains considerable standing remains of the bank as well as a noticeable ditch on its southwest side (Photos 7 & 8). Due to the significant remains and its accessibility via the PROW, this section of Wat's Dyke is considerably sensitive to visual changes. However, views orientated towards the Application Site from this point confirmed that there is substantial screening provided by surrounding mature woodland (Photo 9) and no visual impacts will occur as a result of the proposed development.
- 3.9. A small section of the Scheduled Monument to the east of the Application Site is not screened by intervening mature woodland like the rest of the monument. The section closest to the site is not publicly accessible so it is not clear to what extent standing remains may be present; however, remains could not be seen from either within the Application Site or from New Brighton Road. Views towards the monument from the closest extremity of the Application



Site identified that visibility is partially screened by hedgerows c. 1.5 – 2m high (Photo 10). As this section of the monument is not publicly accessible, any standing remains are unclear and potential views and intervisibility with the proposed development would be partially screened by existing hedgerow. In addition, views southwest from this section of the monument already include existing urban development within New Brighton and its setting in this direction has therefore already been partly compromised. Visual impacts upon this section are therefore anticipated to be low. Similarly, a section of Wat's Dyke further to the east of the Application Site, while confirmed to comprise notable standing remains, is already located amongst the urban development of New Brighton. As a result, this section of monument will not be visually impacted by the proposed development due to the screening effects of the surrounding existing buildings and the resultant lack of views and intervisibility with the Application Site.

Summary of Indirect Impacts

3.10. It is considered that impacts upon the setting of the 'Wat's Dyke: Section N & E of New Brighton' Scheduled Monument are anticipated to be **low** due to the majority of potential views being very well-screened. Only a small section of the monument to the northeast of the Application Site may have partial visibility with the proposed development, but these views are also partially screened by hedges along New Brighton Road. In addition, the setting of the monument in this direction has also been somewhat compromised by the modern urban development within New Brighton. As such, these partially screened views are of limited benefit to the heritage value of its setting.

Mitigation Measures

3.11. Any additional planting at the northeast boundary of the Application Site, which is the primary method to help reduce the limited views which may be possible with this section of the monument, would also screen views southwest from the monument and therefore would not serve to mitigate the main impact upon the sensitivity of the monument. However, due to the **low** indirect impact anticipated on the setting of the 'Wat's Dyke: Section N & E of New Brighton' Scheduled Monument as a result of the proposed development, **no mitigation measures are considered to be necessary**.



4. SUMMARY

4.1. It is considered that impacts upon the setting of the 'Wat's Dyke: Section N & E of New Brighton' Scheduled Monument are anticipated to be **low** due to the majority of potential views being very well-screened. Only a small section of the monument may have partial visibility of the Application Site, but these views are also partially screened by hedges along New Brighton Road and as such are of limited benefit to the heritage value of its setting. Due to the low impact expected, no mitigation measures are considered to be necessary.



5. LIST OF APPENDICES

Appendix A – Figures

• Figure 1 – Site Location and Wat's Dyke Scheduled Monument

Appendix B – Photographs

- Appendix C Cadw Response
- Appendix D Proposed Site Layout





Appendix A





New Brighton Road Site Location and Wat's Dyke Scheduled Monument Figure 1



Neo Office Address: Wright Business Centre, 1 Lonmay Road, Glasgow, G33 4EL



Contains Ordnance Survey data © Crown copyright and database right 2019

Date: 11/06/2019 Drawn By: Michael Briggs Scale (A3): 1:2,000 Drawing No: NEO00607/001I/A



100 200 Metres



Appendix B – Photographs





Photo 2 - View into Application Site from main access point on New Brighton Road, facing south







Photo 3 - View from highest point within Application Site, facing east towards Scheduled Monument

Photo 4 - View from highest point within Application Site, facing northeast towards Scheduled Monument







Photo 5 – View from highest point within Application Site, facing east towards Scheduled Monument

Photo 6 – View along Public Right-of-Way within Application Site, facing north towards Scheduled Monument







Photo 7 – Well-preserved section of Wat's Dyke bank alongside Public Right-of-Way, facing northeast

Photo 8 – Well-preserved section of Wat's Dyke bank with ditch visible, facing north







Photo 9 - View from Scheduled Monument section beside PROW, facing south towards Application Site

Photo 10 – View from northeast extremity of Application Site towards Scheduled Monument, facing northeast







Llvwodraeth Cvmru Welsh Government

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Cadwplanning@gov.wales

Dear Mr Mellan.

Pre-Planning Application – Residential development of 97 dwellings and associated works, Land South of New Brighton Road, New Brighton, Mold, Flintshire CH7 6RB

Thank you for your email of 7 May 2019 inviting our comments on the pre-planning application consultation for the proposed development described above

Advice

The following comments are based on information made available to us as part of the pre-application consultation and we will review our comments when we are consulted on the final planning application.

Having carefully considered the information provided, we consider that it is inadequately documented. Our assessment of the application is given below.

Our role

Our statutory role in the planning process is to provide the local planning authority with an assessment concerned with the likely impact that the proposal will have on scheduled monuments, registered historic parks and gardens, registered historic landscapes where an Environmental Impact Assessment is required and development likely to have an impact on the outstanding universal value of a World Heritage Site. We do not provide an assessment of the likely impact of the development on listed buildings or conservation areas, as these are matters for the local authority.

It is for the local planning authority to weigh our assessment against all the other material considerations in determining whether to approve planning permission.

National Policy

Applications for planning permission are considered in light of the Welsh

Mae Gwasanaeth Amgylchedd Hanesyddol Llywodraeth Cymru (Cadw) yn hyrwyddo gwaith cadwraeth ar gyfer amgylchedd hanesyddol Cymru a gwerthfawrogiad ohono.

The Welsh Government Historic Environment Service (Cadw) promotes the conservation and appreciation of Wales's historic environment.





BUDDSODDWR MEWN POBL INVESTOR IN PEOPLE

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg. We welcome correspondence in both English and Welsh.

Government's land use planning policy and guidance contained in Planning Policy Wales (PPW), Technical Advice Notes and related guidance.

PPW (Chapter 6 – The Historic Environment) explains that it is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.

The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not. Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance)

<u>Technical Advice Note 24: The Historic Environment</u> elaborates by explaining that when considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains.

PPW also explains that local authorities should value, protect, conserve and enhance the special interests of parks and gardens and their settings included on the register of historic parks and gardens in Wales and that the effect of a proposed development on a registered park or garden or its setting should be a material consideration in the determination of a planning application.

Assessment

Scheduled Ancient Monuments FL014 The Bailey Hill, Mold FL051 Round Barrow at Pentrehobin FL052 Rhual-Isaf Round Barrow FL083 Wat's Dyke: Section from Chester-Holywell Road to Soughton Farm FL084 Wat's Dyke: Section SE of Clawdd Offa FL085 Wat's Dyke: Section N & E of New Brighton FL086 Wat's Dyke: Section from Bod Offa to Whitehouse Farm FL121 Wat's Dyke: Sections S of Bryn y Bal FL126 Tyddyn Castle Mound FL165 Taylor's Pottery FL166 Pinfold Lane Pottery, Site of

Registered Parks and Gardens PGW (C) 45 Rhual (grade II*) PGW (C) 22 Pentrehobyn (grade II) PGW (C) 25 Soughton Hall (grade II*) PGW (C) 18 Lower Soughton Hall C18 (grade II) PGW (C) 43 Gwysaney (grade II*)

The above designated heritage assets are located inside 3km of the proposed development but, apart from scheduled monument FL085, intervening topography buildings and vegetation will block all views between them. Consequently the proposed development will not have any impact on these designated heritage assets or their settings.

Scheduled monument FL085 Wat's Dyke: Section N & E of New Brighton is a well preserved section of a linear earthwork which possibly formed a boundary between the Anglo-Saxon kingdom of Mercia and Wales. It was constructed with a ditch on the western side indicating that it was designed to stop incursion from Wales. Significant views from the scheduled monument are therefore westward, the direction in which any attack was likely to be made.

The proposed development will be located some 70m to the west of the scheduled monument. Although the identified significant view includes a road with hedges alongside, it the proposed development will block it and therefore cause an adverse impact on the setting of the scheduled monument. Consequently, this will be a material consideration in the determination of any planning application for this development application (see Planning Policy Wales 2018 section 6.1.23): However no information on this issue has been included in with the pre-application consultation. Consequently you will need to commission an assessment of the impact of the proposed development on the setting of the scheduled monument, prepared in accordance with the methodology outlined in the Welsh Government's best-practice guidance <u>Setting of Historic Assets in Wales</u> (2017). This assessment will need to be included with the other supporting documentation when the planning application is submitted.

Yours sincerely,

Nichola Davies Diogelu a Pholisi/ Protection and Policy