



28 January 2016

Dear Examiners

The recent Historical Impact Assessment for Berain and your letter to CADW of 14 December about Erviat gives great concern that the interests of [REDACTED] may possibly not being wholly taken into account. As one of the only two Grade 2 Star¹ properties (the other being Berain itself) in close proximity to the whole of the 17km proposed pylon route the visual impact and its historic, architectural, aesthetic and cultural values can not be overlooked. Since the inception of the North Wales Wind Farms Connection the applicant has consistently characterised [REDACTED] as a virtual non entity in the context of their plans and, in the light of the proceedings that are about to close, I would be if it could be reviewed.

[REDACTED] was built in 1583 by Robert ap Foulkes² whose family lived there for 250 years and are traceable back very nearly 1,000 years as descendants of the princely Marchweithian tribe³, directly connected by blood and association with their contemporary, Berain, a stone's throw and visible across the valley, and thereby the Welsh Tudors, Katherine the Mother of Wales and the Court of Elisabeth I. It is an original Cross Passage Hall House also described by W.B. Lowe in the Heart of North Wales as "a massive building" and one of the finest examples of an Elizabethan Gentry House, three storied and notable particularly for its unchanged and fine appearance which was strongly influenced by the Flemish input imported by Sir Richard Clough⁴ who was married to Katherine of Berain. It was considered to be a model for many such houses throughout both Wales and England with fine stone appearance, its high status chimneys, rare large first floor Upper Chamber (solar) and great hall oak partition (dais partition)⁵ and fine oak timbering. It also added many firsts of the time – slate roof, dormer windows and the early use of glass⁶.

¹ Grade II* structures are those considered to be "*particularly important buildings of more than special interest*", only once removed from Grade I buildings.

² Thomas ap Foulkes was the grandson of Robert ap "Fychan" Tudur of Berain

³ Geanological trees and information available

⁴ Sir Richard Clough, an eminent financier, was a husband of Katherine of Berain and Queen Elizabeth I's Emissary to Antwerp, the then financial capital of Northern Europe, and was responsible for the introduction of Flemish architecture to the country and great wealth to the Elwy Valley and The Vale of Clwyd.

⁵ Currently in St Fagan's Museum, Cardiff

⁶ Houses of the Welsh Countryside, Royal Commission on Ancient & Historical monuments in Wales & Windows & Doorways in English Secular Architecture 700-1800 <http://extraordinarybookofdoors>

Not least is its commanding position affording an idyllic and panoramic vista to the south of the Elwy Valley, over what was its own parkland, the Clwydian Hills and nearly 20 miles beyond, to the back drop of Llantysillio Mountain. Even to the West there is a view to Snowdonia and to the North the coast and the Irish Sea. The house and Upper Chamber were built to exploit the views of this unique historic setting and they warrant the utmost protection from being overcome by the imposition of highly visible large overhead electricity lines 250 metres to the front and below [REDACTED]

Much play is made of the fact that the pylons are only double wooden poles without mention of the gross incongruity of their whole package in such a setting. The glaring sight every 75m of 15m high structures with striking metal gantries and glass superstructures, thick black cables and countless stays can not be appropriate. The applicants have claimed that the undergrounding of the two small existing electricity lines in the same area as the planned OHL justifies the replacement by the much larger 132kv line. Far more appropriately the OHL should be buried as the existing lines, established before the days of current regulation, are weathered and less than half the mass of the proposed pylons.

The historic interest and setting of [REDACTED] is of the prime importance and it is apt to make comparisons with the Grade 2 property described as Eddington Hall (in fact Edderton Hall) on the Llandinam section of the Scottish Power's application in Mid Wales⁷. Edderton Hall is located in a very similar position to Plas Newydd with fine views over the Severn Valley and had an identical planned line of 132kv pylons intervening. Correctly it was made a View Point, yet Plas Newydd despite sitting higher and more prominent than any other building in the area above the proposed OHL was not made a View Point and this was instrumental in the subtle diminishment by the applicants of its significance.

The next effect was the devaluation by tabular calibration of the assessments of the Visual and Historic impacts of the proposed pylons upon [REDACTED]. In an effort to redress this Scottish Power were formally invited by email in Phase 3 to make a site visit and base their assessments from the actual ground rather than by their subjective desk based appraisals. This was declined and the result was that the impact assessments remained so unqualified that a significant part of their description of the view from [REDACTED] was wholly fictitious⁸ and later in response to EXA's initial written questions it was stated that in their opinion [REDACTED] did not even warrant a site visit by yourselves. Added to this, regrettably (unlike Conwy County Council for Berain) Denbighshire County Council did not represent the Heritage aspect of the NWWFC in the county of Denbighshire nor did they visit [REDACTED] either. Their concurrence with Scottish Power's assessments was therefore purely a rubber stamping of the aforementioned and discredited assessments.

Edderton Hall also had its impact assessments considerable devalued by Scottish Power, however, if the pylons there had been closer and had not been back dropped by trees the Mid Wales Inspector considered that "the proposed OHL would have a significant effect on the special historic interest of Eddington Hall or its setting;" . At [REDACTED] the proposed OHL is 100m closer and not back dropped by trees and the Mid Wales Inspector's conclusion if applied to [REDACTED] would have considerable bearing upon the protection of the special historic interest and setting at [REDACTED] itself. Additionally as a Grade 2 Star property [REDACTED]

⁷ The Inspector's Report on SP Manweb's proposal for the The Llandinam 132Kv line in Mid Wales

⁸ Please see my comments on responses to EXA's written questions of 20 Sept 15 and as observed by yourselves on your site visit to [REDACTED]

is a major a grade higher than Edderton Hall and clearly the 200m limit on visual effect*⁹, on which Scottish Power Manweb place such store, was not a limiting factor.

Previously, even at the inception of the NWWFC¹⁰ the fact that [REDACTED] and four other nearby properties were not notified of the project until Phase 2, nearly a year later, put these properties at a huge disadvantage. At only 1.75 km from the St Asaph substation, it is inconceivable that Scottish Power Manweb were not aware of the importance of traversing the Cefn Meiradog Bryn (limestone ridge) and consequently passing close by the five properties just below it. Likewise they will not have been unaware of the status of [REDACTED] and its location and their omission points at best to a lack of diligence and worst to negligence. By the time we were actually notified our strong protestations¹¹ were robustly rejected and we were denied having any input into the pre destined route^{12*} of their choice by excluding us from that initial and decisive Phase 1 selection process.

As the Pre Application process progressed the continued disregard of [REDACTED] as of any import was reflected in the Environmental Reports showing a degradation of the Visual and Heritage impacts with Scottish Power Manweb categorising them mechanically as “negligible, minor and none” without even making a proper assessment on the ground.

Regarded by the North Wales historian, Meurig Owen¹³, Appendix I, as being in the first rank of Welsh Heritage the significance of [REDACTED] can also be quantified by the same criteria in recent Heritage Impact Assessment submitted for Berain by Scottish Power Manweb.

To a great extent the foregoing has covered the Heritage Impact aspects as they are categorised in the report on Berain however to complete them I add the following:

⁹ The CADW “Guide to Good Practice on Using the Register of Landscapes of Historic Interest in Wales in the Planning and Development Process” (Revised 2nd edition 2007) says “*There is no statutory definition of setting, but it could be considered as having two principal dimensions. Firstly, there is the immediate or essential setting which, in the case of a building, would be the ancillary land used with it or the curtilage. Secondly, there is the wider setting that, in the case of a building, may or may not be legally attached to it, may or may not be used with it, and is often part of the built environment or part of the countryside. Setting should not be interpreted too narrowly, and for the purposes of this process, impacts on settings will be categorised as ‘indirect’ impact’ ...*

¹¹ Scottish Power strongly denied any responsibility or re-consideration of a review of Phase 1 and in ignorance of the realities of rural life maintain that the remaining and obscure local publicity was sufficient notice. The householders stated that either they did not read local papers or visit places displaying notices, had no working internet or even telephones (as the line was down for months at that period of time) or were not permanently domiciled there. Later Scottish Power continued to send notices as mass produced “junk” mail in plain unmarked envelopes, likely to be discarded, in contrast to their vividly and externally identifiable electricity bills until they concurred that this was not acceptable.

¹² Irrespective of the likely environmental effects, the destination of the NWWFC was predetermined upon St Asaph being the terminal point on account of its established position as the terminus for the huge existing Offshore wind farms. Thus the route was planned from St Asaph to Clocaenog and not from Clocaenog to any other potential or possible electricity sub station. This was signified in the [very early correspondence in 2011](#) between Claire Duffy of Scottish Power and the Clocaenog developer RWE who were she confidently assured that that it would be no problem.

¹³ A Grand Tour of North Wales, Ancient Cathedrals of Wales, Cofio’r Cefn (Cefn Remembered)

Historical and Communal Values [REDACTED] stood at the centre of its estate above the River Elwy and has played a principal part in the life of Cefn Meiriadog for over four hundred years. It is historically important because of the way in which it illustrates a past way of life, for instance, the continuity of the occupation of the the Foulkes family for 250 years up and the use of the Upper Chamber for important religious services until the first churches were established in 1865.

From a purely historical and communal level the very presence [REDACTED] also connects us with an important aspect of past life in this region of Wales; one example of this are the local stories which abound of the mythological "Giant of [REDACTED]". It is also a physical historical record of the way in which wealthy landowners managed their estates during the 16th century.

Aesthetic and Evidential Values [REDACTED] is of great architectural and archaeological interest and its relatively recent listing of 1998 attests to this credibility when it was raised to Star status with the final paragraph reading "Listed Grade II Star for its special historic importance as an exceptionally well preserved example of an Elizabethan regional gentry house".

The detailed listing description, Appendix II, attests in much greater detail to the importance of the structure than has been previously mentioned here with the exception of the slates coming by sea from Aberogwen in Caernarvonshire and up the River Clwyd. From the Port of Rhuddlan they were carted to Cefn Meiriadog by way of the ancient lane to Llanefydd below [REDACTED] whilst the stone was quarried just 100 metres from the house in Coed Plas Newydd opposite.

The architecture of the house is lightly influenced by the Dutch style introduced by the Berain compatriot Sir Richard Clough showing a robust sophistication not seen in comparable vernacular houses of the time. (Another Grade II Star example, although more Flemish, is his own house Plas Clough, outside Denbigh and Grade 2 Star Plas yn Cefn also in Cefn Meiriadog). With its imposing height, presence, fine proportions, silver limestone exterior and mullioned windows the aesthetic presence of [REDACTED] is impressive from near and afar.

The recent Heritage Impact Assessment submitted for Berain by Scottish Power Manweb ultimately rules out impact upon Berain on account of the changes and modern buildings which have accumulated in the development of its prime purpose of farming. This in turn has, in their opinion, also reduced its status as a gentry house.

In contrast [REDACTED] has not changed and remains "an exceptionally well preserved example of an Elizabethan regional gentry house", indeed the references at the foot of its listing* extol this virtue. Accredited with the historic, architectural, aesthetic and cultural values described above it follows that there would be an Heritage Impact upon [REDACTED] on account of there being no material changes and remaining solely a gentry house.

Given the indisputable prominence and proximity of the planned OHL below [REDACTED], the visual impact upon it and its setting must qualify for mitigation which can only be achieved by undergrounding the 132kv cables if the present route is not changed.

Yours sincerely

Durand Hotham

Registration No 10031299

Meurig Owen, [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

I wish to register my strong concerns regarding the electricity pylons planned in the vicinity of [REDACTED] the Elizabethan mansion in Cefn Meiriadog, Denbighshire. Bearing in mind the immense size of these structures it is clear that [REDACTED] and indeed the beautiful Bryn Meiriadog and Elwy Valley will be seriously visually impaired unless the power lines are **placed underground**. It seems to me that there is no logical reason why this should not be done and I urge the planning authorities to insist on this course of action.

- [REDACTED], a Grade 2 Listed building, is in my opinion a mansion of great historical importance.
- [REDACTED] was built in 1583 in the style first introduced to Wales by Richard Clough, second husband of Catrin o Ferain. He was Queen Elizabeth the first's emissary in Antwerp (the money centre of the world at the time) and with Sir Thomas Gresham set up the London Stock Exchange based on the Bourse in Antwerp.
- Richard Clough introduced the fine architecture he had seen in Antwerp to Wales of which [REDACTED] is a good example. Built for Ffoulk ap Robert, descended from Marchweithian chief of the 15 tribes of North Wales, it is sited prominently on the rising ground which is a feature of the parish of Cefn Meiriadog. The tall chimneys to indicate that this house had a fireplace, a new concept ('hall houses' before this time would simply have a hearth at the centre of the living room with the smoke wending its way through a hole in the roof. This made for a very sooty atmosphere!) meant that here was a house which could have an up stairs room. And in the case of [REDACTED] an even further large upper room where weddings of the gentry of the day would be held, in 1631 a double ceremony! The dormer windows seen at [REDACTED] also show Clough's influence. Slate slabs brought by sea from Aberogwen in Caernarfonshire, then up the River Clwyd to the 'port' of Rhuddlan, thence carted to [REDACTED] were used for roofing the new mansion. This was yet another new concept.

From the foregoing you will see the historical significance of [REDACTED] and the need to preserve its integrity and place in Welsh history. On no account should this be jeopardized.

APPENDIX II

CADW (Welsh Historic Monuments)

LISTING DESCRIPTION 1998

Authority	Denbighshire	Grade	II*
Community	Cefn Meiriadog	Date Listed	06/10/1952
Locality	Groesffordd Marli	Date Amended	02/06/1998
Post Code	LL22 9DS	Grid Ref	3000037304
Name	Plas Newydd	Record No	153

Location

Strikingly located on a rocky rise some 1.6km NW of Cefn Meiriadog village; located immediately W of the lane running NW from Cefn Meiriadog to Glascoed.

History

Fine Elizabethan storeyed gentry house; built in 1583 for Ffoulk ap Robert (1540 -1607) and his wife Grace Holland and twice dated. Apart from the replacement of the former wooden newel stair with a shaped-balustraded staircase in the third-quarter C17, the reduction of one chimney, and the relocation of an important post-and-panel screen to the Welsh Folk Museum at St Fagans, the house remains (in plan-form and external appearance) largely unaltered. It represents a particularly stylish and sophisticated version of the vernacular storied end-chimney, cross-passage house-type, most popularly adopted during this period by the North Walian gentry caste. In addition to the end chimneys (that at the parlour end serving the attic floor only) the house has an additional lateral chimney serving the hall and upper parlour or solar above, a feature typical of the earlier of this class of houses. The most curious (and seemingly unparalleled) aspect of the design is that the kitchen bay is raised up by about a metre, with a cellar below and with the corresponding first-floor chamber similarly stepped-up. It seems that this elevation of floor-levels at the service end was probably necessitated by the inclusion of a rock-cut cellar which would otherwise have had minimal head-room rendering it impracticable. The kitchen has its own external entrance, accessed via a raised, stepped platform to the L of the main cross-passage entrance. However, despite its vernacular character, the inclusion of large stone mullioned and transomed windows to the main rooms and two generous gabled dormers to the attic floor (one dated) suggest an emulation of more polite domestic architecture beyond the ambition of most houses of this date and context. An early C19 single-storey service range runs parallel with the main house and is connected to it by a low modern link block.

Exterior

Large storeyed end-chimney house with further, lateral chimney incorporating a now reduced stair projection, forming an L-plan with the main block; constructed of squared local limestone blocks with finely-tooled quoins; built on rock foundations (partly exposed). The original rubble gable parapets have been removed, as have those to the dormers, although the original half-round eaves moulding and double kneelers survive; slate roof with tiled ridge. Tall primary chimneys to R and rear, that to the L reduced by half, probably in the late C19 The garden (S) side has a round-headed entrance to R of centre with small square light to L with chamfered reveals; above this is a 3-light mullioned window. To the R there are further 3-light mullioned windows to the ground and first floors with 2-light windows to the cellar and attic; that to the latter contained within a large gabled and kneelered dormer. To the L are large 4-light mullioned and transomed windows to the ground and first floors, with a dormer above, as before. 3-light ground-floor and 2-light first-floor window to the far L. The E and W gables have small contemporary single and double light windows to the upper floors, the latter with further 2-light

and 3-light windows to the ground floor. The E gable has a projecting rock/rubble plinth with a privy outlet at dado height with projecting stone trough.

The N side faces a service court with remains of (apparently) original cobbling. Round-headed cross-passage entrance as before, partly-blocked with a 2-light window insertion and a further 2-light mullioned window to the first floor above. Stepped-up to immediately the L is a further, similar entrance; this is the former kitchen entrance and is approached via a stepped platform which also originally served as a mounting block; C20 boarded door. To the R is the large, gabled lateral chimney projection with adjoining and associated former stair bay. This has been altered and now extends with lean-to roof to the E, occupying half of the projecting breast. It has a chamfered square-headed, oak-framed entrance to its E side. Adjoining to the N and W are two further, connected lean-to additions, both C20. These are further extended westwards in a modern flat-roofed, single-storey link block of rubble construction. The link block connects the main house with a C19 single-storey rubble service range, with squat chimneys and pitched slate roof. This lies opposite the primary block and closes the service court on the N side.

Interior

Conventional three-unit cross-passage plan, though the service court entrance to the latter was decommissioned early on. This is now partly obscured by a third-quarter C17 L-shaped stair with moulded rail and flat, shaped balusters; the majority of both these and the rail are modern oak replacements and are associated with a similarly modern first-floor balustraded landing. Stopped-chamfered ceiling beams to passage and main (former) kitchen beams. The kitchen is accessed via a stepped-up entrance with moulded oak door case which leads off from the passage to the L; C20 boarded and studded oak door. Wide end fireplace with segmental arch with dressed voussoirs. At the southern end of the passage is a further moulded door case giving access via stone steps to a low cellar; original boarded and studded oak door (from which all others are copied). Similar door and door case opposite, leading to the former hall. The garden (S) cross-passage entrance retains its original draw-bar, which has early scratched graffiti.

High-ceilinged square hall with fine moulded main and subsidiary beams to ceiling framed in three ways; stopped-chamfered joists. Large lateral fireplace with segmental arch and voussoirs as before. In the NW corner the return flight of the staircase is visible as it cuts across the upper part of the hall; this has a boarded cupboard beneath, which incorporates reused sections of a primary post-and-panel screen, together with a polygonal-sectioned oak newel, relocated as a corner post. This was clearly formerly the newel for a wooden spiral stair and probably represents the remains of the original stair before the C17 replacement. To the R of the fireplace is a moulded door case as before, formerly giving access to the stair projection. The fine screen dividing the hall from the parlour has been removed to the Welsh Folk Museum at St Fagans, though is shown in situ in early C20 photographs; it is dated 1583. A modern brick wall now replaces this. Further moulded beams to parlour ceiling supported at the wall on curved stone corbels. Two original post-and-panel screens to the first floor, with grooved decoration and Tudor-arched entrances to former upper parlour/solar and central room; stopped-chamfered ceiling beams and a projecting lateral fireplace with flat stone lintel supported on curved corbels. Square-headed chamfered oak door case to former stair projection. The attic has a 5-bay roof with two partition trusses with wattle and daub infill panels. At the W end is a further corbelled fireplace, as before.

Listed

Listed Grade II* for its special historic importance as an exceptionally well-preserved example of an Elizabethan regional gentry house.

Reference

Beazant, Lowe W. *The Heart of Northern Wales*, Vol.11, 1927, pp 371-8.

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Smith, P. *Houses of the Welsh Countryside*, 1988, p 267, maps 281. 35,37,38,48a/

RCAI-IMW, *Denbighshire Inventory*, 1914, pp 24-5 (79).