

This submission comprises the Welsh Historic Gardens Trust Relevant Representation in relation to the application by Horizon Nuclear Power Limited (HNP) for a Development Consent Order (DCO) for the Wylfa Newydd Nuclear New Build Project.

We feel that the Impact on Cestyll Gardens and its setting during both construction and operational phases has not been adequately addressed. There is a lack of detail in relation to the proposals, and how impacts will be avoided, managed, mitigated or compensated for.

We are also concerned that the significance of the Sylvia Crowe landscape surrounding the existing power station has been underestimated.

Our key concerns are:-

1. The effects of airborne pollution during construction which could have a detrimental effect upon the planting in the Valley Garden.
2. The consequences of potentially destabilising vibration during construction, these effects may take years to show, especially with regards to the health of mature trees.
3. The proposed redirection of ground water into the Afon Cafnan and through the Valley Garden, this, in times of heavy rainfall could cause potentially catastrophic erosion of the planting and banks of the stream running through the Valley Garden.
4. The effect upon the seaward view during and after construction, especially the industrial nature of the proposed breakwater which will dominate this, the essential view from the Valley Garden.
5. The viability of the existing shelter-belt on the eastern side of the Valley Garden and the necessity of augmenting it immediately, for it to have any mitigatory effect during the construction of Wylfa Newydd.
6. The Kitchen Garden has been assessed as of low significance in itself but its position as part of a designed landscape is particularly significant. The Kitchen Garden has already been damaged during initial clearance phases so any mitigation in the form of reconstruction would enhance the relevance of the Valley Garden and increase the cohesion of the garden as a whole.
7. With regard to Wylfa Newydd Project 6.4.76 ES Volume D - WNDA Development App D11-5 - Assessment of Significance of Dame Sylvia Crowe's Landscape Design at the Existing Power Station, section 6, Evidential Value, the wealth of documentary evidence and the physical presence of the landscape as a functioning entity complement each other and allow a clear understanding of Crowe's work practices and methods, contrary to the suggestion in the above report that because of the depth of documentation there is no need to preserve the actual monument! It can be argued that the opposite holds true and we believe this provides a unique example of the progression and management of a project from initial thoughts to completion. The example quoted in the above report of the difference in tree species

specified in the Crowe documentation to those actually planted shows a clear example of the economies and practicalities that can result in deviations from the plans, without the physical only half the story is told. We therefore believe that the Evidential Value is high.

8. With regard to the section in the above report on Aesthetic Value, we would dispute that the role of the designed landscape as one of camouflage and utility is in any way to its detriment and suggests that it has fulfilled its designated purpose and is of high value for this reason. The fact that the woodland is in decline is to be expected given the age of the conifers and applying Cadw Conservation Principles (Cadw 2011) then periodic renewal should be expected and the need for this should not downgrade the significance of the landscape.

The distant silhouette of the Existing Power Station framed by the Sylvia Crowe Landscape can be described as one of the iconic Anglesey views, visible from large parts of the hinterland and comparable with the great C18th- 19th landscapes of the Picturesque movement. Crowe herself compared her role as landscape architect to that of artists such as Paul Nash and Ben Nicholson in her work *Landscapes of Power*, measuring their techniques of setting a grid over a landscape to create a new form of painting against her own work "It is as if men were putting a grid of reference over the landscape seeking to translate it to some new dimension and to keep their bearings in a strange land" (Crowe 1958, 19). We believe, therefore, that it is appropriate to ascribe greater aesthetic value to this landscape when it is rightly regarded as an art work in its own right.

These factors when added to those discussed in the above report would suggest a high Aesthetic Value.

9. The Cadw Conservation Principles also stress that when assessing Communal Value uncomfortable events, attitudes or periods in Welsh history, should be taken into account. In the case of the Existing Power Station this can refer to the anti-nuclear movement of the late C20th and the use of the panoramic view of the Existing Power Station and its surrounding landscape as propaganda.

This is not included within the assessment of significance, or mentioned in the above report and as a result a lower value has been ascribed to the Sylvia Crowe Landscape.

We believe that the Communal Value of the site is high.

In conclusion we believe that the Wylfa Newydd Project 6.4.76 ES Volume D - WNDA Development App D11-5 - Assessment of Significance of Dame Sylvia Crowe's Landscape Design at the Existing Power Station does not assess the significance of the Sylvia Crowe landscape in enough detail and we consider it deserving a status of high significance, and should be protected and managed accordingly.

Bibliography

Cadw, 2011 *Conservation Principles for the Sustainable Management of the Historic Environment in Wales*.

Crowe, Sylvia, 1958 *Landscapes of Power* , The Architectural Press.

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