

Adran yr Economi a'r Seilwaith
Department for Economy and Infrastructure



Llywodraeth Cymru
Welsh Government

The M4 Motorway (Junction 23 (East of Magor) to West of Junction 29 (Castleton) and Connecting Roads) and The M48 Motorway (Junction 23 (East of Magor) Connecting Road) Scheme 201-

The M4 Motorway (Junction 23 (East of Magor) to West of Junction 29 (Castleton) and Connecting Roads) and The M48 Motorway (Junction 23 (East of Magor) Connecting Road) (Amendment) Scheme 201-

The London to Fishguard Trunk Road (East of Magor to Castleton) Order 201-

The M4 Motorway (West of Magor to East of Castleton) and the A48(M) Motorway (West of Castleton to St Mellons) (Variation of Various Schemes) Scheme 201-

The M4 Motorway (Junction 23 (East of Magor) to West of Junction 29 (Castleton) and Connecting Roads) and the M48 Motorway (Junction 23 (East of Magor) Connecting Road) and The London to Fishguard Trunk Road (east of Magor to Castleton) (Side Roads) Order 201-

The Welsh Ministers (The M4 Motorway (Junction 23 (East of Magor) to West of Junction 29 (Castleton) and Connecting Roads) and the M48 Motorway (Junction 23 (East of Magor) Connecting Road) and the London to Fishguard Trunk Road (East of Magor to Castleton)) Compulsory Purchase Order 201-

The M4 Motorway (Junction 23 (East Of Magor) to West of Junction 29 (Castleton) and Connecting Roads) and The M48 Motorway (Junction 23 (East Of Magor) Connecting Road) (Supplementary) Scheme 201-

The Welsh Ministers (The M4 Motorway (Junction 23 (East Of Magor) to West of Junction 29 (Castleton) and Connecting Roads) and The M48 Motorway (Junction 23 (East Of Magor) Connecting Road) and The London to Fishguard Trunk Road (East of Magor to Castleton)) Supplementary Compulsory Purchase Order 201-

Summary Proof of Evidence

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Welsh Government, Cultural Heritage

Document Reference: WG 1.9.2

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1. Author

1.1 My name is Mick Rawlings and I hold the role of Technical Director (Historic Environment) at RPS Planning and Development, a division of RPS Group plc. I hold a BA Honours Degree in Archaeology and Geography, awarded in 1985 by the University of Southampton, and am a full Member of the Chartered Institute for Archaeologists (CIfA).

1.2 Since 2004 I have been employed by RPS Planning and Development, during which I have been involved in several major highway schemes.

1.3 I have been the team leader for cultural heritage on the M4CaN Scheme since the Costain/Vinci/Taylor Woodrow Construction Joint Venture (CJV) was awarded the ECI contract by Welsh Government, having advised the CJV team during the tendering process.

2. Scope of Proof of Evidence

2.1 My evidence is concerned with the impacts and effects on cultural heritage resources resulting from the construction and operation of the published Scheme. These resources comprise:

- a) buried archaeological remains;
- b) historic buildings; and
- c) the historic landscape

2.2 I also respond to any issues raised by Representations with regard to cultural heritage matters.

3. Methodology and Consultation

- 3.1 The effects of the published Scheme on cultural heritage resources are described in Chapter 8 of the March 2016 Environmental Statement (ES, Document 2.3.2). The methodology used in the March 2016 ES for the assessment of effects resulting from changes within the setting of a heritage asset responds to current and developing policy and guidance documents.
- 3.2 An Academic Advisory Panel was established by RPS during the tender stage ahead of the award of the ECI contract by Welsh Government. This was in acknowledgement of the importance of the historic landscape through which the new section of motorway would pass, along with the nature and significance of archaeological remains that may be present.
- 3.3 Consultation during the preparation of the material produced in support of the Draft Orders for the published Scheme was undertaken with the following bodies:
- a) Cadw
 - b) Natural Resources Wales
 - c) Glamorgan-Gwent Archaeological Trust
 - d) Newport City Council
 - e) Monmouthshire County Council
 - f) National Trust

4. Option Selection and Scheme Design

- 4.1 A conceptual design was prepared ahead of the award by Welsh Government of the Professional Services Contract for the present stage of scheme development leading to publication of Draft Orders.
- 4.2 Some of the subsequent changes to the conceptual design now reflected in the published Scheme were directly linked to concerns regarding effects on cultural heritage resources, e.g., the relocation of some of the Water

Treatment Areas (WTAs) along the route of the new section of motorway.

4.3 There are several general aspects to the design of the published Scheme that have been instigated in part with regard to the reduction of potential effects on cultural heritage resources. These include:

- a) Vertical alignments;
- b) Materials and finishes;
- c) Landscape planting; and
- d) Noise attenuation.

5. Cultural Heritage Designations

5.1 The locations and extents of statutory and non-statutory designated cultural heritage resources within the study area(s) for the published Scheme are shown on Figures 1 – 4 in Appendix A of my Proof of Evidence (WG 1.9.3).

5.2 An assessment of the impact of the published Scheme on the Gwent Levels Landscape of Outstanding Historic Interest has been prepared in line with the guidance provided in the *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, Document 9.1.4). This assessment has been published as Appendix 8.3 of the March 2016 ES (Document 2.3.2).

6. Cultural Heritage Baseline

6.1 A detailed account of the known archaeological and historical baseline within the defined study area for the published Scheme and also for the wider area is provided in Appendix 8.2 of the March 2016 ES (Document 2.3.2).

6.2 The new section of motorway crosses the Gwent Levels, much of which has been placed on the non-statutory *Register of Landscapes of Outstanding*

Historic Interest in Wales.

- 6.3 Within the defined study area the principal known site/findspot of likely Bronze Age date is a standing stone located between Undy and Llanfihangel, near to the current M4 Junction 23.
- 6.4 The initial efforts to drain parts of the Levels were made during the Roman period (AD 43 - 410). The full extent of this drainage remains unknown and most of the reclaimed land was subsequently flooded.
- 6.5 Most of the evidence for activity within the Levels during the early medieval period (c. AD 410 - 1066) comes from documentary sources.
- 6.6 The current landscape of the Gwent Levels is predominantly a result of the process of drainage and recolonization, which commenced during the medieval period (c. AD 1066 – 1500).
- 6.7 Many of the historic buildings within the defined study area date to the post-medieval period, including Tatton Farm, Pye Corner Farm and Fair Orchard Farm (all of which are Grade II listed buildings).
- 6.8 There are a number of buildings of 19th and early 20th century date within the docks at Newport that are also within the defined study area. They include a group of former railway engine running sheds as well as transit sheds (where goods were stored).
- 6.9 Just to the north of the docks, the River Usk is spanned by the Newport Transporter Bridge. This was constructed to link the town with industrial development on the east side of the river and was opened in 1906. It is now a Grade I listed building.

- 6.10 At the eastern end of the defined study area is the Grade II listed Woodland House (also known as Magor Vicarage), built in 1861 in a Tudor/Jacobean Revival style.

7. Effects of the Published Scheme on Cultural Heritage Resources

- 7.1 A detailed assessment of the likely effects of the published Scheme on cultural heritage resources is presented in Chapter 8 of the March 2016 ES (Document 2.3.2). Further assessment and clarifications/ corrections can be found within the September 2016 ES Supplement (Document 2.4.4).
- 7.2 A number of mitigation measures have been incorporated within the design of the published Scheme. These are described in Section 4 of my Proof of Evidence (WG 1.9.1). The effects presented in Chapter 8 of the March 2016 ES (Document 2.3.2) and summarised below are those that would occur with the designed-in mitigation in place.
- 7.3 The proposed new section of motorway cuts through the northern edge of two parts of the registered Gwent Levels Landscape of Outstanding Historic Interest. In my opinion the published Scheme of motorway would have a Moderate magnitude of impact on the registered historic landscape and the consequent significance of effect is Moderate or Large. In my opinion the correct significance of effect is Large and this is a significant adverse effect.
- 7.4 The Llanfihangel Rogiet Conservation Area would experience direct physical impact as a result of the construction and operation of the published Scheme. Along with the physical impact there would also be impacts on other parts of the Conservation Area in the form of visual changes and a slight increase in traffic noise.
- 7.5 The September 2016 ES Supplement (Document 2.4.4) assesses a revised arrangement for the proposed Junction 23. In my opinion the overall

magnitude of impact on the Conservation Area would be Moderate, as would the significance of effect. This is a significant adverse effect.

- 7.6 One Scheduled Ancient Monument would experience a direct physical impact as a result of the construction and operation of the published Scheme. This is a standing stone of probable Bronze Age date at Undy, known as the Devil's Quoit.
- 7.7 The design of the published Scheme enables the retention of the standing stone in its current (and presumed original) location. In my opinion, the magnitude of impact on the standing stone as a result of the changes within its setting would be Major for both the construction and operational phases of the published Scheme. I have assessed the consequent significance of effect as Large, which is a significant adverse effect.
- 7.8 There is a second Scheduled Monument on the eastern edge of Undy, south of the B4245 road. This is a well-preserved moated site of medieval date. In my opinion the magnitude of impact on the Scheduled Monument during construction would be Moderate. I have assessed the consequent significance of this temporary effect as Moderate adverse, which is a significant effect.
- 7.9 Woodland House (also known as Magor Vicarage) is the only listed building that would be demolished in order to construct the published Scheme. As the Grade II listed vicarage (and the curtilage buildings) would be fully demolished, the magnitude of impact would be Major and I have assessed the consequent significance of effect to be Large and permanent. This is a significant adverse effect.
- 7.10 There would also be long-term adverse effects of Moderate significance with regard to the Grade I listed Transporter Bridge, the Grade II* listed Whitson Court and the Grade II listed Tatton Farm as a result of changes within their

settings.

- 7.11 There would be permanent adverse effects of Moderate significance resulting from the demolition of three non-listed historic buildings within Newport Docks and from the removal of the remains of a Second World War barrage balloon tether site at Pye Corner (Nash).
- 7.12 In my opinion the construction of the published Scheme would result in Moderate adverse effects with regard to: a small rectangular moated platform of medieval or possibly post-medieval date located immediately south west of the junction of Rush Wall and North Row; a group of Late Iron Age and Early Roman enclosures just to the west of Magor; and also the shrunken medieval settlement at Llanfihangel.
- 7.13 Within the Gwent Levels in particular, currently unknown buried archaeological remains could be present that are of High or even Very High value. In my opinion, impacts on such remains could be as high as Major, leading to effects of Large or Very Large significance.

Mitigation

- 7.14 Appendix 8.10 of the March 2016 ES (Document 2.3.2) comprises a Cultural Heritage Mitigation Plan (CHMP). This document identifies those historic buildings that would be subject to recording prior to demolition (either detailed recording or basic recording). It also describes the programme of historic landscape study which would be undertaken in respect of the areas of Gwent Level back-fen traversed by the new section of motorway.
- 7.15 With regard to buried archaeological remains, the CHMP identifies the known archaeological sites that would be affected by the construction of the proposed new section of motorway and describes the scope and extent of any work that is to be undertaken in order to alleviate any adverse effects. It also identifies areas where further information regarding the presence/absence of archaeological features would be sought through a

programme of archaeological evaluation. The locations of these proposed archaeological excavations and evaluations are indicated on Figure 6 in Appendix A of this Proof of Evidence (WG 1.9.3).

- 7.16 The CHMP additionally describes how an archaeological watching brief would be undertaken during defined construction works at locations that had not been covered by other forms of archaeological mitigation and where impact on presently unknown buried archaeological sites is possible.

8. Response to Concerns raised in Representations

Cadw

- 8.1 Cadw (OBJ0341) provided an initial response to the Draft Orders in which a number of concerns were raised. Welsh Government met with Cadw to discuss these concerns and then provided a detailed reply to Cadw, who subsequently confirmed that they were not objecting to the published Scheme.
- 8.2 Cadw additionally noted '*We acknowledge that the nature of the land may require a departure from national policy and this will be a matter for the Inspector to consider*' (Appendix B of my Proof of Evidence, WG 1.9.3). I understand this to be a reference to the absence of intrusive archaeological investigation within the Gwent Levels part of the proposed new section of motorway and the subsequent issues arising with regard to the potential for the *in situ* preservation of archaeological sites.
- 8.3 The methodology utilised for intrusive evaluation needs to be closely aligned with the nature and extent of any impact resulting from the Scheme. Impacts in areas of higher archaeological potential within the Gwent Levels could occur to depths of 7 metres or more below current ground level. Examination of this archaeological potential through the use of trial trenches would therefore require substantial excavations.

- 8.4 Our experience of geotechnical work in this part of the Levels shows that each area of investigation would need to be pumped and the excavation area and spoil heaps would need to be fully fenced. It is likely that we would need to construct a temporary access road to each excavation location. On completion of the excavation at each location, the trench would have to be backfilled with the arisings. Given the nature of the ground this would result in an area of very wet, soft ground that would be unsuitable for grazing or cultivation. If there are livestock in the vicinity then the backfilled excavation area would need to remain fenced.
- 8.5 Thus it is our view that the excavation of trial trenches in the Gwent Levels at this stage could result in a considerable amount of visible and physical impact within the registered historic landscape and SSSI without the surety that the published Scheme would actually proceed. If the published Scheme does not progress through to construction then this work could leave a legacy of visible impact along with short-medium term issues regarding compensation for loss of grazing or crop acreage.
- 8.6 Section 8.5 in Chapter 8 of the ES (Document 2.3.2) describes mitigation measures that are incorporated into the design of the published Scheme. This includes examples where the design has enabled the preservation of cultural heritage remains in situ.
- 8.7 Preservation in situ in this situation is therefore more a matter of controlling impacts through design. In my opinion the approach taken by Welsh Government does not represent a departure from national policy.

Other Representations

- 8.8 Comments relating to cultural matters have been received from Natural Resources Wales, Monmouthshire County Council and Newport City Council, and also from some third party objectors. I have outlined Welsh Government's responses to these comments in Section 8 of my Proof of Evidence (WG 1.9.1).

9. Conclusions

- 9.1 I have identified the likely effects of the published Scheme on cultural heritage resources in line with appropriate methodologies and guidance. In Chapter 8 of the March 2016 ES (Document 2.3.2), I described several significant effects as identified above in Section 7 of this Summary Proof of Evidence. In the September 2016 ES Supplement (Document 2.4.4), I reviewed changes to the design of the Scheme since publication of the Draft Orders and reassessed the likely effects on cultural heritage resources where appropriate.
- 9.2 Impacts on cultural heritage resources have been reduced wherever possible within the design of the published Scheme. A programme of further archaeological investigation and historic building recording has been identified within the CHMP (Appendix 8.10 of the March 2016 ES, Document 2.3.2), along with a requirement for an archaeological watching brief and the procedures for carrying out additional archaeological investigations where necessary. The CHMP also describes a programme of historic landscape study that will be carried out alongside the archaeological investigations.
- 9.3 With regard to national planning policy, the evidence presented by Mr John Davies (WG 1.23.1) describes how, although the published Scheme is contrary to the Welsh Government's objectives of preserving or enhancing the historic environment (as expressed in Chapter 6 of Planning Policy Wales, Document 5.1.12), this policy recognises that the overarching objectives for the historic environment cannot always be met and that exceptions must sometimes be made.
- 9.4 I can confirm that this evidence represents my true and professional opinion.