

Our ref: MTY0273/RD

## ARCHAEOLOGICAL PLANNING

Head of Planning  
Merthyr Tydfil County Borough Council  
Unit 5  
Triangle Business Park  
Pentrebach  
Merthyr Tydfil  
CF48 4TQ

27th April 2022

Dear Sir

**Re: Proposed plastics recycling and processing facility, including two warehouse units with internal office and welfare facilities, external storage area, combined heat and power unit, car parking, weighbridge, surface water lagoon, associated infrastructure, lighting and landscaping**  
**Land to the east of Goat Mill Road, Dowlais, Merthyr Tydfil**  
**Pl.App.No.: P/22/0064**

Thank you for consulting us about this application; consequently we have reviewed the detailed information contained on your website and can confirm that **the proposal requires archaeological mitigation.**

Information in the Historic Environment Record indicates that the application area partially contained the Dowlais Great Tip and the Great White Tip. It is also located within the Merthyr Tydfil Registered Historic Landscape, specifically the Dowlais Great Tip, Trecatti, Trehir and Twyn-y-Waun Character Area (HLCA078). The area formed part of the extensive coal and ironstone workings associated with Dowlais Ironworks. The workings of the area spanned from the latter half of the 18th century, through the hey days of iron production associated with railway construction during the 1840s, and the conversion of Dowlais to steel production during the 1860s. With conversion to steel production the area's mineral workings declined, being all but abandoned by the early 1870s; a result of coal and iron ore imports from northern Spain, the local ore, rich in phosphorous and sulphur being unsuitable for steel production. By 1879, most if not all the pits and levels within the area, were probably already defunct.

As a result an ASIDOHL2 has been compiled (Archaeology Wales Report no. 1895a, dated September 2021). The assessment concludes that the impact on the Historic Landscape will be Slight.

The majority of the site was subject to opencast coal mining in 1996, before being remediated and restored. This process removed the Great White Tip and likely the majority of mining features. However, there are parts of the site that were not subject to the opencast and are Archaeologically Sensitive Areas. As such it is possible that archaeological features survive and be adversely affected by the proposed development.

Therefore it is our recommendation that a condition requiring the applicant to submit a detailed written scheme of investigation for a programme of archaeological work to protect the archaeological resource should be attached to

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any consent granted by your Members. This is consistent with our response to the pre-application consultation.

We envisage that this programme of work would take the form of a watching brief during the groundworks required for the development, with detailed contingency arrangements including the provision of sufficient time and resources to ensure that any archaeological features or finds that are located are properly investigated and recorded; it should include provision for any sampling that may prove necessary, post-excavation recording and assessment and reporting and possible publication of the results. To ensure adherence to the recommendations we recommend that the condition should be worded in a manner similar to model condition 24 given in Welsh Government Circular 016/2014

*No development shall take place until the applicant, or their agents or successors in title, has secured agreement for a written scheme of historic environment mitigation which has been submitted by the applicant and approved by the local planning authority. Thereafter, the programme of work will be fully carried out in accordance with the requirements and standards of the written scheme.*

*Reason: To identify and record any features of archaeological interest discovered during the works, in order to mitigate the impact of the works on the archaeological resource.*

We also recommend that a note should be attached to the planning consent explaining that:

*The archaeological work must be undertaken to the appropriate Standard and Guidance set by Chartered Institute for Archaeologists (CIfA), ([www.archaeologists.net/codes/ifa](http://www.archaeologists.net/codes/ifa)) and it is recommended that it is carried out either by a CIfA Registered Organisation ([www.archaeologists.net/ro](http://www.archaeologists.net/ro)) or an accredited Member.*

If you have any questions or require further advice on this matter please do not hesitate to contact us.

Yours faithfully

*R. Dunning*

Rob Dunning BSc MCIfA  
Archaeological Planning Officer