

Merthyr Tydfil County
Borough Council

Eich cyf/Your ref: P/25/0037

By Email
planning@merthyr.gov.uk

Ein cyf/Our ref:

Dyddiad/Date:
12 March 2025

Dear Sir/Madam

Planning Application – Variation of conditions 4, 6 and 50 of APP/U6925/A/10/2129921 - revision to restoration scheme at Ffos Y Fran Land Reclamation Scheme East Of A4060 Slip Road Merthyr Tydfil

Thank you for your letter of 21 February 2025 inviting our comments on the information submitted for the above planning application.

Advice

We have significant concerns about the impact on the scheduled monuments, registered historic parks and gardens and Registered Historic Landscape. However, we consider that if mitigating measures were undertaken, our concerns about the impact would be reduced.

The national policy and Cadw's role in the planning process are set out in Annex A.

Assessment

Scheduled Monuments

GM494 Sarn Howell Pond and Watercourses

Inside 3km

Scheduled Monuments

GM028 Morlais Castle

GM220 Gelligaer Common Round Cairns

GM221 Gelligaer Common Standing Stone

GM222 Merthyr Common Round Cairns

GM314 Platform Houses and Cairn Cemetery on Dinas Noddfa

GM320 Platform Houses on Coly Uchaf

GM331 Ynys Fach Iron Furnaces

GM403 Rhymney Upper Furnace



GM424 Pont y Cafnau Tramroad Bridge
GM425 Remains of Blast Furnaces, Cyfarthfa Ironworks
GM467 Cyfarthfa Canal Level
GM478 Gurnos Quarry Tramroad & Leat
GM479 Tai Mawr Leat for Cyfarthfa Iron Works
GM486 Iron Canal Bridge from Rhydycar
GM496 Deserted Iron Mining Village, Ffos-y-fran
GM556 Gelligaer Common Roman Road
GM563 Morlais Hill ring cairn
GM572 Abercanaid haystack boiler
GM573 Merthyr Tramroad Tunnel (Trevithick's Tunnel)
GM594 Merthyr Tramroad: Morlais Castle section
GM606 Vale of Neath railway cutting and tunnel portal
GM607 Cwm Pit and head of railway
GM608 Cyfarthfa balance pond and leat
GM609 Black Pins early ironstone workings
GM610 Cwm Glo Chapel
GM611 Cwm Glo pit and ironstone tip
GM624 Rhaslas Pond South Dam

Registered Parks and Gardens:
PGW(Gm)1(MER) Cyfarthfa Castle

Registered Historic Landscape:
HLW (MGL) 2 Merthyr Tydfil

This application is for the variation of conditions to allow a revised scheme of restoration at Ffos Y Fran Land Reclamation Scheme, East of A4060 Slip Road, Merthyr Tydfil.

The application is accompanied by an environmental statement produced by Richard Morehead and Laing with chapter 13 covering Cultural Heritage, based on information contained in an archaeological desk-based assessment produced by Archaeology Wales.

This work concludes that the proposed restoration works will be beneficial to the settings of the scheduled monuments, but with a moderate adverse impact on the registered historic landscape and also on undesignated historic assets, if the records of the previous archaeological works are not disseminated. We concur with this conclusion and note that in order to mitigate these adverse impacts it is proposed to

- ensure that research and results of the archaeological investigations which has been carried out during the Stage III Reclamation scheme should be compiled and disseminated as public record.

- create information panels near to Sarn Howell Pond and the Listed Aqueduct, informing the public on the nearby monuments as well as considering the incorporation of heritage walking routes into the final design subject to further health and safety risk assessments.

We agree that these measures would produce suitable mitigation/offsetting that will reduce the identified adverse impacts to acceptable levels.

Cadw will therefore not object to the positive determination of the current application, subject to the imposition of suitably worded conditions ensuring that the proposed mitigation measures are implemented.

Yours sincerely

Denise Harris
Historic Environment Branch

Annex A

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

PPW [Planning Policy Wales - Edition 12 \(gov.wales\)](#) 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)

[Technical Advice Note 24: The Historic Environment](#) 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.

Historic Parks and Gardens

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.