



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

7th October 2020

FAO: Huw Roberts

Dear Sir/Madam,

Re: Residential development consisting of the conversion and extension to a listed building to create 7 apartments and a dwelling, construction of 62 dwellings (including 31 affordable units), the demolition of existing buildings, landscaping, re-profiling of land, alterations to the existing access and other associated works
Former St Tydfils Hospital, Upper Thomas Street, Merthyr Tydfil
Pl.App.No.: P/20/0199

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 will require archaeological mitigation.**

Information in the Historic Environment Record (HER), curated by this Trust, shows that the application area is situated within the Merthyr Tydfil Registered Historic Landscape (HLW (MGI) 2), specifically the Thomas Town (West) Character Area (HLCA034), as defined within the *Register of Landscapes of Outstanding Historic Interest in Wales*. The HER also shows that there are two Listed Buildings (both Grade II) within the proposed development area. The Statue and Plinth to Sir W.T. Lewis (Cadw ref. 11476) dating to 1900, and the Entrance Block of St Tydfil's Hospital (Cadw ref. 11475) which is dated 1870, although originally built as part of the Merthyr Union Workhouse (1853). The HER also references the Pont-morlais Infirmary which was located in the eastern part of the site and demolished before World War II. The route of the Roman road (R621-02b), leading from the fort at Penydarren Park to the fort at Caerphilly, is also projected to cross the proposed site.

We have made several recommendations for archaeological mitigation in response to previous proposals and applications. Whilst we note the intention of establishing a biodiversity reserve in the east of the site and the demolition of the majority of the non-listed structures on the site following an application in 2014, subsequent aerial photography indicates the probable survival of foundations and floor-slabs. There is also the possibility of Roman material being located within the proposed development area. As a result, there remains the potential of encountering archaeologically significant remains during the course of the works. Furthermore, the proposal has the potential to expose and/or effect the historic fabric of the Listed Entrance Block (e.g. the new openings, blocking of existing doorways, windows, internal partitions etc.) and mitigation will be required.

Therefore, we recommend that two conditions should be attached to any consent to ensure appropriate mitigation. Firstly, in order to preserve the buildings by

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record we strongly recommend that a building survey is made prior to works commencing. We would recommend that this takes the form of a Level 3 survey as set out in “*Understanding Historic Buildings: A Guide to Good Recording Practice*”, Historic England, 2016.

To ensure that work is carried out in a suitable manner, we therefore suggest that a condition worded in a manner similar to model condition 73 given in Welsh Government Circular 016/2014 is attached to any consent that is granted in response to the current application. This condition is worded:-

No works to which this consent relates shall commence until an appropriate programme of historic building recording and analysis has been secured and implemented in accordance with a written scheme of investigation which has been submitted to and approved in writing by the local planning authority

The justification for the imposition of the condition would therefore be: -

Reason: As the building is of architectural and cultural significance the specified records are required to mitigate impact.

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/cifa) and it is recommended that it is carried out either by a CIfA Registered Organisation (www.archaeologists.net/ro) or an MCIfA level accredited Member.

Secondly, 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 any consent granted by your Members.

We envisage that this programme of work would take the form of an archaeological watching brief during all associated 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.

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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.*

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

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

Yours faithfully,

Hannah Bowden BA MSc
Archaeological Planning Officer

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