

Our Ref: MTY0268/JBHD

ARCHAEOLOGICAL PLANNING



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Planning

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

11th December 2020

FAO: David Cross

Dear Sir

Re: Construction a 9ML 2-cell Reservoir and Associated Engineering, Access and Landscaping Works:
Pengarnddu Service Reservoir, Pengarnddu Industrial Estate, Dowlais Top, Merthyr Tydfil.
Pl.App.No.: P/20/0228.

Thank you for consulting us regarding this application and for supplying further supporting documentation. **The proposal will require archaeological mitigation.**

The proposed location is within the Merthyr Tydfil Registered Historic Landscape (Cadw reference HLW (MGI) 2) and within the character area HLCA041 Merthyr Common North. This is characterised as: *Common land, water management features (Dowlais Free Drainage and Merthyr Tydfil Corporation); minor industrial extractive landscape*. Information in the Historic Environment Record shows no identified archaeological features or findspots in the immediate area of the proposed works, however, it should be noted that the Dowlais Free Drainage System covers a wide area and that whilst some elements of it are noted as features, there are also others which are not noted separately.

The supporting information for the proposal includes an ASIDOHL (Assessment of the Significance of the Impact of Development on Historic Landscape Areas on the Register (Mott MacDonald, June 2020)) as the proposal will have a direct physical impact on a character area. The report has been undertaken in accordance with the accepted methodology (Guide to Good Practice on Using the Register of Landscapes of Historic Interest in Wales in the Planning and Development Process (Cadw, CCW, WAG 2007). The assessment concludes that there will be an impact, defined as moderate for HLCA041, moderate for the adjoining HLCA035, and slight for HLCA047. The suggested mitigation for the visual impact includes a reduction in the height and style of fencing, and for herbaceous planting; and an archaeological watching brief for the physical impact.

There is potential for archaeological features and finds to be encountered during the development. Primarily, there is a likelihood that these would relate to the Dowlais Free Drainage system, and include drains, culverts, ditches and other associated earthwork features. Archaeological work on proposals in conditions such as this have sometimes encountered organic materials preserved in the upland peats, and these have included preserved wood, occasionally associated with other finds dated to the prehistoric (and other) periods.

The Glamorgan-Gwent
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The archaeological impact will need to be mitigated, as any ground disturbing work may encounter remains of earlier activity.

Given our understanding of the archaeological resource in the area, we therefore recommend that a condition should be attached to any consent granted by your Members, to ensure appropriate mitigation by requiring the applicant to submit a written scheme of investigation to undertake a detailed programme of archaeological work.

We envisage that this programme of work would include an archaeological watching brief during any ground disturbing work, identifying any elements of the proposals which may also need to be hand-dug by archaeologists. This will include a programme of archaeological sampling of any peat deposits encountered. The written scheme, of investigation will ensure that a targeted programme of work can be facilitated, with detailed contingency arrangements including the provision of sufficient time and resources to ensure that any archaeological features that are located are properly excavated and analysed, and 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:

A detailed report on the archaeological work, as required by the condition, shall be submitted to and approved in writing by the Local Planning Authority within six months of the completion of the archaeological fieldwork

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 accredited MCIfA Member.

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

Yours faithfully



Judith Doyle BA MBA MCIfA
Archaeological Planning Officer