



Our ref: MTY0242/CB

ARCHAEOLOGICAL PLANNING

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

9th December 2021

Dear Sir/Madam

Re: Residential development and associated engineering, access and landscaping works

Land off Elm Tree Grove, Twynyrodyn, Merthyr Tydfil

PLApp.No.: 21/0358

We noted this application when we reviewed your weekly planning list; consequently we have consulted the detailed information contained on your website and identified that **the proposal has an archaeological restraint**.

We have consulted the regional Historic Environment Record (HER) and note the proposed development area is within the Registered Historic Landscape of Merthyr Tydfil (HLW (MGI) 2). The majority of the site falls within the Historic Landscape Character Area (HLCA) of Cwm Blacks (048), and the western edge of the site is within the HLCA Ysgubor Newydd (037). The site also lies within the Ironworks Landscapes (IW016-18) of the Dyffryn, Pentrebach and Plymouth Ironworks.

In order to ascertain the impact that the development will have on the Registered Historic Landscape, a suitably qualified archaeologist should prepare an ASIDOHL2 (Assessment of the Significance of the Impact of Development on the Historic Landscape). The ASIDOHL2 methodology should follow 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.

An archaeological desk based assessment was undertaken for the entire larger area in 2019 (Red River, 2019), which identified that the site could contain buried structural features relating to the former Dyffryn and Plymouth Ironworks. The HER and historic maps identify features which could survive underground such as shafts and coal levels. Further investigation from Geotech Site Investigation Report (Report no.9913.GNS/08) has established contamination and a number of underground services, which would prevent the safety of archaeological investigation in any other form other than a watching brief (Section 24). Therefore, should the development receive planning consent, in order to mitigate the impact of the development on the archaeological resource, we recommend that a condition, requiring an archaeological watching brief be conducted during the groundworks for the development should be attached to any planning consent granted in respect to the current application. This should include all ground breaking activities including works for foundations and for the provision of services. This recommendation is made following the guidance given in Planning Policy Wales 2021 (Edition 11) Section 61.27 with additional advice being provided in TAN24, section 4.14. It is suggested that the condition should be worded in a manner similar to model condition 24 given in Welsh Government Circular 016/2014:

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

If you or the applicant have any questions or require further advice on the contents of this letter please do not hesitate to contact us.

Yours faithfully

C. Bellamy

Charlotte Bellamy BA Hons, PG Cert, ACIfA
Assistant Stewardship Officer

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