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Merthyr Tydfil County Borough Council

By email: planning@merthyr.gov.uk

Eich cyfeirnod
Your reference

P/19/0073

Ein cyfeirnod
Our reference

DH

Dyddiad
Date

31 October 2019

Llinell uniongyrchol
Direct line

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Dear Sir/Madam

Planning Application – Provision of 36 camping pods and 5 chalets, Bike Park Wales, Gethin Woodland Centre, Abercanaid

Thank you for your letter of 10 October 2019 inviting our comments on the information submitted for the above planning application.

Advice

Having carefully considered the information provided with this planning application, we consider that it is inadequately documented.

Our assessment of the application is given below.

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-10.pdf](#) explains that It is important that the planning

Mae Gwasanaeth Amgylchedd Hanesyddol Llywodraeth Cymru (Cadw) yn hyrwyddo gwaith cadwraeth ar gyfer amgylchedd hanesyddol Cymru a gwerthfawrogiad ohono.

The Welsh Government Historic Environment Service (Cadw) promotes the conservation and appreciation of Wales's historic environment.

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg.
We welcome correspondence in both English and Welsh.



BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE



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.

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.

Assessment

Scheduled Monuments

GM222 Merthyr Common Round Cairns, GM236 Garn Las Earthwork, GM239 Gwersyll, GM287 Darren Fawr Round Cairns, GM288 Graig-y-Gilfach round cairn and earthwork, GM331 Ynys Fach Iron Furnaces, GM368 Ring Cairn South of Twyn Blaennant, GM460 Cwmdu Air Shaft & Fan, GM467 Cyfarthfa Canal Level, GM494 Sarn Howell Pond and Watercourses, GM496 Deserted Iron Mining Village, Ffos-y-fran, GM572 Abercanaid haystack boiler, GM573 Merthyr Tramroad Tunnel (Trevithick's Tunnel), GM586 Carn Castell y Meibion ring cairn, 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

Registered Parks and Gardens

PGW (Gm) 69(MER) Aberfan: Cemetery, Garden of Remembrance & Former Tip and Slide Area (grade II)

Registered Historic Landscape

HLW (MGL) 2 Merthyr Tydfil

The above designated heritage assets are located inside 3km of the proposed development area and a number of them have clear views of it (for instance scheduled monument GM222 Merthyr Common Round Cairns is located on the ridge of Mynydd Cilfach-yr-encil which is clearly visible in Photograph 2 of the Landscape Statement included as Chapter 7 of the Environmental Statement submitted in support of this application). The development therefore clearly meets the requirement of The Town and Country Planning (Development Management Procedure) (Wales) (Amendment) Order 2016 Schedule 4 Consultations. Before the Grant of Permission Paragraph I, for The Welsh Ministers (Cadw) to be consulted as part of the pre-application consultation, but this was not done.

Cadw and, we understand, the Glamorgan-Gwent Archaeological Trust (the archaeological advisors to Merthyr Tydfil County Borough Council) were not consulted in regard to the scoping for the environmental impact assessment, hence the impact of the proposed development on the historic environment has not been considered in the environmental statement submitted with this application. However this will be a material consideration in the determination of this application (see Planning Policy Wales 10 (2018) sections 6.1.19 and 6.1.23) and information on this issue will need to be submitted prior to the determination of this application. It is suggested that, in the first instance, a desk-based heritage assessment, meeting the standard and guidance set by the Chartered Institute for Archaeologists should be produced and this should include an assessment of the impact of the proposed development on the setting of historic assets carried out in accordance with the methodology outlined in the Welsh Government document "The Setting of Heritage Assets).

An assessment of the impact of the proposed development on the registered historic landscape following the methodology outlined in the Welsh Government's Guide to Good Practice on Using the Register of Landscapes of Historic Interest in Wales in the Planning and Development Process (see Planning Policy Wales 10 (2018) sections 6.1.21 and Technical Advice No 24 section 7.6 – 7.8) will also need to be submitted prior to the determination of this application.

Yours sincerely,

Denise Harris
Diogelu a Pholisi/ Protection and Policy