



Archaeoleg Morgannwg-Gwent

Heneb

Glamorgan-Gwent Archaeology

Our ref: MTY0290/JBHD

ARCHAEOLOGICAL PLANNING

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

17th November 2025

Dear Sir

Re: Demolition of existing buildings and development of a restaurant with drive-thru facility (Use Class A3) including access and cycle path, servicing, car parking, hard and soft landscaping, advertisements and other associated works.

Land to the North of the Heads of the Valleys Road, off Rhymney Common Road, Dowlais.

Pl.App.No.: P/25/0265.

Thank you for consulting us about this application; consequently we have reviewed the detailed information contained on your website. **The proposal will require archaeological and historic environment mitigation.**

Information in the Historic Environment Record shows the site to be within the Merthyr Tydfil Registered Historic Landscape of Outstanding Importance (Cadw reference HLW (MGL) 2) and within that, the Historic Character Area of Dowlais Top, HLCA047. This is characterised as: *Reclaimed industrial area, recent commercial, retail and light industrial area, site of industrial extractive landscape: quarries and spoil tips, rail corridor: Brecon and Merthyr Railway (including Dowlais Top Station) and sidings associated with Dowlais Iron Company Railway.*

Set in the wider landscape of minerals extraction, and land and water management recorded from the early 19th century, and currently largely reclaimed, aqueducts, drains and leats nearby associated with the Dowlais free drainage system that utilised and managed water from the uplands to supply the Dowlais Ironworks are recorded in the HER.

Specifically, the area formed part of the Dowlais Top railway station, where the L&NWR Dowlais Extension, the Merthyr, Tredegar and Abergavenny Railway, and the Brecon and Merthyr Railway converged with tramroads supplying the ironworks with raw materials. Historic mapping sequences show varied railway features as well as trackways and sidings, such as buildings, signal posts, and other unidentified features. Whilst the greater part of the area has been reclaimed and reutilised, the south eastern part around the existing station house is likely to retain evidence of the former uses, which may become apparent during the development

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Cadeirydd / Chair: Dr Carol Bell

PSG / CEO: Richard Nicholls

Cwmni Cyfyngedig (1198990) ynghyd ag Elusen Gofrestredig (504616) yw'r Ymddiriedolaeth

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work. This will require mitigation and therefore we recommend the attachment of two conditions to ensure the evidence is identified and recorded.

Firstly, in order to preserve the current form and layout of existing structures associated with the railway, we recommend that a historic building survey is made prior to any works commencing. We would recommend that this takes the form of a Level 2 survey as set out in *Understanding Historic Buildings: A Guide to Good Recording Practice* (Historic England 2016). This will provide a record of the structure, in such detail as to preserve it by record with a written account of the building and its history, plans, and photographs with a measured scale and directional plan.

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 buildings is of cultural significance the specified records are required to mitigate impact.

Secondly, we recommend 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 archaeological monitoring and recording (watching brief) during the 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

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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): [CIfA Codes, regulations and Standards, and guidance | CIfA](#) and it is recommended that it is carried out either by a [CIfA Registered Organisation](#) or a [MCIfA level accredited Member](#).

It is the responsibility of the applicant and their archaeologist to ensure the final report is deposited within the Historic Environment Record to meet the requirements of the Historic Environment (Wales) Act 2023 and the HERs Guidance [Guidance-for-the-Submission-of-Data-to-Welsh-HERs-V4-EN.pdf](#).

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

Yours faithfully

Judith Doyle

Judith Doyle BA Hons MBS FSA MCIfA

Arweinydd Rhanbarthol/Regional Lead

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