

Merthyr Tydfil County Borough Council

Eich cyfeirnod
Your reference

P/23/0208

By email

Ein cyfeirnod
Our referenceDyddiad
Date

4 October 2023

Llinell uniongyrchol
Direct line

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Ebost
Email:Cadwplanning@gov.wales

Dear Sir/Madam

Planning Application – Construction of mountain bike trails, access trails and uplift track extension & amendments, at Gethin Woodland Centre A470 Pentrebach To Rhydycar Northbound Abercanaid

Thank you for your letter of 13 September 2023 inviting our comments on the information submitted for the above planning application.

Advice

We consider that the application is inadequately documented and we recommend that additional information is required to enable a balanced decision to be taken against Planning Policy Wales, Technical Advice Note 24 Historic Environment and associated guidance. Full details of the additional information that is required are explained in the below assessment.

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The national policy and Cadw's role in planning are set out in Annex A.

AssessmentScheduled Monuments

GM222 Merthyr Common Round Cairns

GM236 Garn Las Earthwork

GM239 Gwersyll

GM272 Cefn Merthyr Round Cairns

GM286 Brynbychan Round Cairn

GM287 Darren Fawr Round Cairns

GM288 Graig-y-Gilfach round cairn and earthwork

GM331 Ynys Fach Iron Furnaces

GM368 Ring Cairn South of Twyn Blaenant

GM401 Hut Circles & Enclosures on Buarth Maen

GM402 Carn Pentyle-Hir & Adjacent Round Cairn

GM425 Remains of Blast Furnaces, Cyfarthfa Ironworks

GM438 Gadlys Ironworks (Remains of Blast Furnace)





GM460 Cwmdu Air Shaft & Fan
GM467 Cyfarthfa Canal Level
GM486 Iron Canal Bridge from Rhydycar
GM494 Sarn Howell Pond and Watercourses
GM495 Cyfarthfa Tramroad Section at Heolgerrig
GM496 Deserted Iron Mining Village, Ffos-y-fran
GM527 Tramroad East of Robert's Town Bridge, Aberdare
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)1(MER) Cyfarthfa Castle
PGW(Gm)69(MER) Aberfan: Cemetery, Garden of Remembrance and Former Tip and Slide Area

This planning application is for proposed new mountain bike trails and an access track at BikePark Wales, Gethin Woodland Centre, Abercanaid.

In response to the statutory pre-application consultation Cadw responded:-

“The above scheduled monuments and registered historic parks and gardens are located inside 3km of the proposed development but the proposed trails will not have a direct impact on them: However, the application area is located inside the registered Methyr Tydfil landscape of outstanding historic interest. This landscape was registered due to the important relicts of the iron and coal working industries located in it. Elements of these industries are located inside the application area and are likely to be adversely affected by the proposed trails. Whilst these are not currently designated historic assets, they are included in the statutory Historic Environment Record, curated for the Welsh Ministers by the Glamorgan-Gwent Archaeological Trust. As such the impact of the proposed development on these historic assets will be a material consideration in the determination of any planning application (see section 6.1.23 of Planning Policy Wales). It is therefore recommended that prior to the submission of any planning application an archaeological assessment of the application area is prepared, from which the scale of the impact of the proposed trails on the historic assets can be determined and, if required, appropriate mitigation measures can be implemented to reduce these impacts”.

It appears from the Pre-Application Consultation Report that the applicant's agent has misunderstood this advice, considering that the recommendation was for information on the Registered Historic Landscape to be provided, rather than information on the individual historic assets and therefore has argued that the information is not required: However, section 6.1.23 of Planning Policy Wales states:-



“The planning system recognises the need to conserve archaeological remains. The conservation of archaeological remains and their settings is a material consideration in determining planning applications, whether those remains are a scheduled monument or not”.

Whilst section 6.1.26 provides more detailed guidance on the need for information on the archaeological resource needs to be submitted with a planning application:-

“Where archaeological remains are known to exist or there is a potential for them to survive, an application should be accompanied by sufficient information, through desk-based assessment and/or field evaluation, to allow a full understanding of the impact of the proposal on the significance of the remains”.

Consequently, the application currently does not include sufficient information of the application to be determined. As such your Authority should request the applicant to submit archaeological desk-based assessment of the application area produced by a qualified expert in accordance with the standards and guidance of the Chartered Institute for archaeologists.

Yours sincerely,

Denise Harris
Historic Environment Branch

Annex A

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-11.pdf](#) explains that it is important that the planning 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.

Historic Parks and Gardens

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.

