

# APPLICATION *for Scheduled Monument Consent*

ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979

*(To be completed by or on behalf of the applicant in BLOCK CAPITALS or typescript)*

## 1. Applicant

Name: <b>Waun Maenllwyd Wind Energy Hub Limited</b>	
Address: <b>Waun Maenllwyd Wind Energy Hub Limited, 10 Victoria Street, Bristol</b>	
	Postcode: <b>BS1 6BN</b>
Telephone number <b>07599 936100</b>	

## 2. Occupier of monument (if not the applicant)

Name: <b>National Trust</b>	
Address: <b>Heelis, Kemble Drive, Swindon</b>	
	Postcode: <b>SN2 2NA</b>
Telephone number	

## 3. Monument to which application relates

Name (if any) of monument: <b>Pumsaint Roman Fort</b>
Address or location: <b>Pumsaint village,</b>
<b>Cynwyl Gaeo, Carmarthenshire</b>
County Monument Number: <b>CM226</b>
National Grid reference: <b>265645, 240573</b>

## 4. Description of proposed works

### *Background*

Access from Swansea port to the Waun Maenllwyd Wind Energy Hub in south-east Ceredigion has been the subject of several option appraisals. After detailed assessment the alternative routes have been discounted due to a range of logistical, engineering and environmental constraints, leaving a right hand turn into the junction at Pumsaint with its existing forestry road, the most viable route. Previous designs required

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reprofiling the inside of the bend, involving cut and fill of the current ground surface and encroachment into the registered park and garden at Dolaucothi. Archaeological evaluation in 2024 showed that significant remains of a Roman road lay at a depth below the surface that would be physically disturbed by the depth of groundworks proposed by the original design.

*Overview of current design*

The current design presents a new scenario, one which takes the turning circle north of the forestry road into the playing field and thereby minimises any ground reduction in the inside of the bend (apart from recent accumulation behind the stone wall), and avoids running through the western corner of the registered park and garden. On the north side of the forestry road there are two banks with some trees planted on it which are of relatively recent date. This feature was probably created as a boundary to a green lane, which was later replaced by the forestry road, but the new design avoids impact on this feature within the scheduled area, with the proposed access route allowing the delivery vehicles to turn smoothly off the highway and around to the north of the banks, rejoining the forestry road c.300m east of the scheduled monument. Aluminium steel plates will be laid to effectively neutralise the potential for compression to buried archaeological deposits.

*Delivery vehicle solution and ground reprofiling*

Using a more accurate topographic survey than was available previously, complemented by LiDAR, and through mechanically raising the towers and blades as high as the delivery vehicles will safely allow whilst turning, the new design has significantly reduced and minimised the need for excavation within the scheduled area, except for some minor ground reduction adjacent to the east of the driveway to Dolaucothi Lodge (the driveway itself lies outside the scheduled monument). Archaeological evaluation of this area in March 2025 showed there to be no sensitive remains here between ground level and design level. The proposed access route would run east through the field, being built up with fill material to avoid any further ground disturbance. A layer of sand or geotextile would be used to mark the existing ground level, before the track construction is built on top of it, so it can be removed at the appropriate time. The proposed earthworks would only be required if not already completed by a third-party development.

*Oversail and stone wall*

The new design requires an oversail to the southwest of the highway, and on both sides of the forestry track, which would require the partial dismantling of the existing dry-stone wall on the inside of the bend within the scheduled area adjacent to the junction and minor reprofiling of the recent accumulation of soil behind it. This wall would be rebuilt and ground reprofiled to original levels after completion of turbine component deliveries. Archaeological evaluation of this area in May 2024 showed that the sensitive remains here (the top infill layer of a Roman ditch) would be significantly lower than the levels required for minor reprofiling. Compression is not a concern here because the reprofiling is to allow oversail of wind turbine components only.

*Compression and temporary road surface*

Geotechnical investigations have assessed the potential for compression to buried archaeological remains and deposits, and have calculated that worst case loading of the delivery vehicles would be no more than typical pedestrian loading, if load-spreading aluminium trackway plates are laid down to act as a roadway in areas where there is no tarmac surface.

*Permanent and temporary works*

The earthworks would remain in place for the operational life of the project, to minimise potential disturbance to the archaeology by repeatedly depositing fill material above the scheduled monument. Other parts of the proposal would be temporary, for example the removal of the small stone walls, which would be reinstated post-construction, but would need to be temporarily removed again for the replacement of turbine components and/or decommissioning. The aluminium plates would be temporarily laid during delivery periods then removed afterwards.

*Playing Field development*

As discussed with the Cadw Inspector responsible (Jonathan Berry) via phone call, it may become agreed with the Pumsaint Coronation Hall Committee who manage the Playing Field and the National Trust who own the Playing Field, to carry out some amenity enhancement work in the Playing Field. These works may or may not be within the scheduled monument area and all design/construction details are TBC as the discussions are at an early stage. The works may include decommissioning the quoits pitch and moving it elsewhere in the Playing Field, decommissioning/building/upgrading a small children's play area, building a fence along the boundary between the Playing Field and the forestry track, and any other works agreed with the Committee and National Trust. If and once the works have been agreed with the Committee and the National Trust, the construction methodology and evaluation, if required, would be discussed and agreed with Cadw in advance of any of the works taking place.

***Proposed methodology***

- All hedge and trees should be surveyed by a suitably qualified ecologist in advance for nesting / roosting animals prior to works commencing. If anything is discovered all works should stop until the appropriate measures are taken in line with current legislation;
- Suitable traffic management and signage to be erected at the junction and along the forest track. Vehicular access should be prohibited during the works. Welfare facilities should be situated away from the monument and works areas;
- Where possible removal of trees and vegetation clearance down to 0.5m above existing ground level should be carried out by qualified tree surgeons using chainsaws and other handheld cutting equipment, cut in segments no greater than 1m and supported using guy ropes to arrest any fall preventing impact with the ground below; All material removed from site should be stored away from the scheduled monument or chipped by machinery located nearby;
- Ground clearance down to the design levels should be carried out by hand excavation, with all material moved off site to a pre-agreed store;
- Once the final design level has been reached, the qualified tree surgeons should then come in and remove the final section of tree stumps and any large protruding roots which may obstruct the installations of the aluminium plating;
- Once the ground is at the design level and clear of trees and vegetation, the aluminium plating should be installed as per the manufacturer's instructions prior to any vehicle loads being allowed in the area.
- Where fill is required, a layer of sand and/or geotextile membrane will be laid to mark the existing ground level so it can be returned to its original state once the track is decommissioned.

It is proposed that archaeological monitoring and recording be undertaken during all groundworks. A written scheme of investigation (WSI) accompanies this application. It is anticipated that the work will be undertaken by Heneb – The Trust for Welsh Archaeology, once the WSI has been finalised after stakeholder comments, and approved by Cadw, and only if the wind farm project gets planning consent.

***5. List of plans and drawings accompanying application***

01 – Site location plan
02 – Design drawings & soil analysis and compression review
03 – Access options appraisal
04 – Heneb's reporting of the first and second phases of archaeological evaluation at the junction
05 – A draft written scheme of investigation (WSI) by Heneb is attached
06 – A preliminary Heritage Appraisal and supplementary archaeological review were submitted as part of the pre-application consultation with Cadw

***6. Any other information relevant to application***

Pre application consultation with Cadw's Inspector and other stakeholders has identified the main issues and explored possible methods to enhance our understanding of the sensitivity of the area to which this application is made. It is our understanding that following a second phase of archaeological evaluation in the

cut area of the new design, an interim summary report produced by Heneb and a phone conversation to discuss the results, the Cadw Inspector responded favourably towards the redesign.

**I/We hereby apply for scheduled monument consent for the works described in this application and shown on the accompanying plans and drawings.**

Signature: [Redacted – Regulation 13 Personal Data]

Date: 30/06/2025

On behalf of \*

**\* Where the application is being dealt with by an agent to whom correspondence should be sent, state the:**

Name of the agent: Hampton Heritage Design & Consultancy Ltd [Redacted – Regulation 13 Personal Data]

Address of agent: Hampton Heritage Design & Consultancy Ltd, Hampton House, 28 Hampton Road,  
Oswestry, Shropshire

Postcode: SY11 1SJ

Telephone number: [Redacted – Regulation 13 Personal Data]

## **CERTIFICATE of Ownership**

ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979

***One of the following certificates must be completed by or on behalf of the applicant***

***A. Certificate in accordance with paragraph 2(1)(a) of Schedule 1 to the Act***

It is hereby certified that no person other than the applicant was the owner (note x) of the monument to which the accompanying application relates at the beginning of the period of twenty-one days which ended on the date of the application.

Signature

Date

***B. Certificate in accordance with paragraph 2(1)(b) of Schedule 1 to the Act***

It is hereby certified that the applicant has given the requisite notice of the accompanying application to all the persons other than the applicant who, at the beginning of the period of twenty-one days which ended on the date of the application, were owners (note x) of the monument to which the application related, namely (note y).

Signature: [Redacted – Regulation 13 Personal Data]

Date 30/06/2025

***C. Certificate in accordance with paragraph 2(1)(c) of Schedule 1 to the Act***

It is hereby certified:

1. that the applicant is unable to issue a certificate in accordance with either paragraph 2(1)(a) or (b) of Schedule 1 to the Ancient Monuments and Archaeological Areas Act 1979;
2. that the applicant has given the requisite notice of the accompanying application to the following persons who, at the beginning of the period of 21 days which ended on the date of the application, were owners (note x) of the monument to which the application relates, namely (note y).

; and

3. that the applicant has taken such steps as are reasonably open to him to ascertain the names and addresses of the remainder of the persons who at the beginning of that period were owners (note x) of that monument and has been unable to do so.

Signature

Date

***D. Certificate in accordance with paragraph 2(1)(d) of Schedule 1 to the Act***

It is hereby certified that the applicant is unable to issue a certificate in accordance with paragraph 2(1)(a) of Schedule 1 to the Ancient Monuments and Archaeological Areas Act 1979, but has taken steps as are reasonably open to him to ascertain the names and addresses of other persons who, at the beginning of the period of twenty-one days which ended on the date of the accompanying application, were owners (note x) of the monument to which the application relates and has been unable to do so.

Signature

Date

***Footnotes***

(note x ) 'owner' means a person who is for the time being the estate owner in respect of the fee simple in the monument or is entitled to a tenancy of the monument granted or extended for a term of years certain of which not less than seven years remain unexpired.

(note y) insert names and addresses.

## **NOTICE of application for Scheduled Monument Consent**

ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979

*If you are the owner of the monument you do not need to fill in this form.*

*If you are making an application but you are not the owner you should complete this form and send it to the owner.*

This notice relates to the ancient monument at (note x)
<b>CM226 Pumsaint Roman Fort</b>
An application is to be made by/on behalf of (note y)
<b>Waun Maenllwyd Wind Energy Hub Ltd</b>
to the Welsh Government for scheduled monument consent under the Ancient Monument and Archaeological Areas Act 1979 to carry out the following work: (note z)
The proposed works are to enable access for AILs to access the Waun Maenllwyd Wind Energy Hub along the existing forestry road, turning off the national highway at Pumsaint.
Archaeological monitoring and recording would ensure a record is made of the superficial disturbance to topsoil that would facilitate the temporary access arrangements.
An opportunity to make representations with respect to the application will be afforded by the Welsh Government before the application is determined.
Signature: [Redacted – Regulation 13 Personal Data]      Date <b>30/06/2025</b>

### **Footnotes**

(note x ) State the address or location of the monument and the name (if any)

(note y) Insert name and address of applicant

(note z) Insert brief description of the proposed works



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Cadw, Welsh Government,  
Rhydycar Business Park  
Merthyr Tydfil

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