

Waun Maenllwyd Wind Energy Hub Limited

Sent by email

Eich cyfeirnod  
Your reference

Ein cyfeirnod  
Our reference

Dyddiad  
Date

Llinell uniongyrchol  
Direct line

Ebost  
Email:

CM226 – SMC2857

1 September 2025

[Redacted – Regulation 13 Personal Data]

[scheduledmonuments@gov.wales](mailto:scheduledmonuments@gov.wales)

Dear [Redacted – Regulation 13 Personal Data],

**HISTORIC ENVIRONMENT (WALES) ACT 2023  
APPLICATION FOR SCHEDULED MONUMENT CONSENT  
PUMPSAINT ROMAN FORT (CM226)  
Ref: SMC2857**

## 1. Introduction

1.1 Thank you for your application of 30 June 2025 to Cadw for scheduled monument consent for:

- (i) the localised reduction and building up of the ground
- (ii) the construction of a temporary trackway to facilitate the delivery, maintenance and decommissioning of a wind farm during its operational lifetime.

1.2 Cadw is a Department within the Welsh Government that undertakes the statutory functions of the Welsh Ministers in determining applications for scheduled monument consent.

1.3 Each application for scheduled monument consent is considered on its own merits in accordance with *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* ([Conservation Principles](#)) and Annex A of *Technical Advice Note 24: The Historic Environment* ([TAN 24](#)). In particular, TAN 24 explains that the main purpose of scheduling is to ensure the preservation of monuments of national importance and, when considering an application for scheduled monument consent, there is a presumption against proposals which would involve significant alteration or cause damage, or which would have a significant impact on the setting of remains.

## 2. Assessment



- 2.1 Your application and supporting documentation has been assessed by our Regional Inspector of Ancient Monuments who has recommended that conditional scheduled monument consent should be approved. The reasons for the Inspector's conclusions are set out in **Annex A** of this letter.
- 2.2 I have carefully considered the impact of the proposed development on the scheduled monument and its setting in light of the advice that I have received from our Regional Inspector of Ancient Monuments. I have no reason to disagree with the advice of our Regional Inspector and am satisfied that his recommendation is consistent with the objectives of Conservation Principles and TAN 24.

### 3. Decision

- 3.1 Accordingly, I hereby approve conditional scheduled monument consent for the proposed works as outlined in section 1.1.
- 3.2 In reaching this decision, I have taken into account the requirement of sections 3 and 5 of the Well-being of Future Generations (Wales) Act 2015. I consider that this decision is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of *A Wales of vibrant culture and thriving Welsh Language*.
- 3.3 Any development control issues associated with wider development will be a matter for any application for planning permission. It is the responsibility of the applicant to establish whether any further approval or consents are required for the proposed development.

### 4. Conditions

- 4.1 The following conditions are intended to protect the monument from damage or significant alteration as set out in TAN 24: *The Historic Environment* and to ensure that details of the project are archived.
- a) The applicant shall provide Cadw with at least five working days' advance notice of commencement of works on site and will afford access at all operational times to any Cadw official or archaeologist nominated by Cadw to monitor progress of the works;
- b) The approved works shall be carried out strictly in accordance with the application form, plans and documents as listed below. No variations are permitted unless they have been authorised in advance in writing by Cadw;



Number	Document / plan	Reference Number (if applicable)	Date
1	SMC application form signed by [Redacted – Regulation 13 Personal Data], Hampton Heritage Design & Consultancy on behalf of Belltown Power and The National Trust and dated 2025		30/06/2025
2	Belltown Power location plan	SMC 01	10/11/2023
3	Pell Frischmann design drawings	SMC 02a	25/03/2025
4	Belltown Power design detail	SMC 02b	26/06/2025
5	Pell Frischmann soil analysis and compression review	SMC 02c	22/07/2024
6	Pell Frischmann access options appraisal	SMC 03	23/10/2023
7	Heneb archaeological evaluation 1 report [Phase 1]	SMC 04a	21/10/2024
8	Heneb archaeological evaluation 2 report [Phase 2]	SMC 04b	20/06/2025
9	Heneb written scheme of investigation for archaeological monitoring and recording	SMC 05	26/06/2025
10	Hampton Heritage Design & Consultancy preliminary heritage appraisal	SMC 06a	14/10/2022
11	Hampton Heritage Design & Consultancy supplementary information for heritage appraisal	SMC 06b	22/10/2023

- c) A digital copy of the draft watching brief report shall be submitted to Cadw for approval within eight weeks of the archaeological fieldwork being completed<sup>1</sup>;

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<sup>1</sup> Cadw will retain a copy of the watching brief report for our records.



- d) A digital copy of the approved watching brief report shall be submitted to the regional Historic Environment Record and National Monuments Record of Wales to be incorporated into these public records<sup>2</sup>, and the applicant shall inform Cadw when this has been completed;
- e) Cadw shall be invited to attend a site meeting prior to the commencement of the project to review the programme and arrangements that have been established for archaeological mitigation and recording;
- f) That upon completion of the project the applicant shall produce a completion report including an annotated photographic record detailing the site before, during and after works took place and including final versions of plans and elevations as built. The draft should be sent to Cadw in digital format for approval within 25 working days of the works being completed; and
- g) Any historic or archaeological features not previously identified which are revealed when carrying out the works shall be retained in situ and reported to Cadw within two working days. Works shall be halted in the area/part of the site affected until provision has been made for retention and/or recording of the feature by a suitably qualified archaeologist in accordance with details submitted to and approved in writing in advance by Cadw.

## **5. Compliance**

- 5.1 Where a condition requires approval or any contact with Cadw you are advised to contact [Redacted – Regulation 13 Personal Data] by email [scheduledmonuments@gov.wales](mailto:scheduledmonuments@gov.wales) or by telephone on [Redacted – Regulation 13 Personal Data].
- 5.2 When all work has been completed and the conditions have been discharged, please complete and return the 'completion notice' at Annex B to Cadw. Section 30(2)(b) of the 2023 Act provides that non-compliance with a condition attached to a grant of scheduled monument consent shall be an offence.
- 5.3 By virtue of Section 19(2) of the 2023 Act, if no works to which this consent relates are started within 5 years from the date of this letter, the consent shall cease to have effect at the end of that period (unless it is revoked in the meantime).
- 5.4 This letter does not convey any approval or consent required under any enactment, bylaw, order or regulation other than Section 13 of the 2023 Act. It is the responsibility of the applicant to obtain any such approval or consent where necessary.

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<sup>2</sup> Cadw requires formal confirmation of report deposit to discharge condition.

## 6. Mechanism for Challenge

6.1 Sections 72 and 73 of the 2023 Act explain that if you are aggrieved by the decision given in this letter, you may challenge its validity by applying to the High Court within six weeks from the day after the date of my decision. Furthermore, the legislation explains that the grounds on which an application may be made to the Court are;

- a) that my decision is not within the powers of the Act (i.e. that I have exceeded the powers available under the Act); and
- b) that any of the relevant requirements set out in the Act have not been complied with and that your interest has been substantially prejudiced by the failure to comply.

6.2 The 'relevant requirements' mentioned above are defined in Section 73(5) of the 2023 Act and it is advisable to seek legal advice before taking any action.

6.3 Should you have any queries please do not hesitate to contact me.

6.4 Finally, please note that your personal data is managed in compliance with the [General Data Protection Regulations](#).

Yours sincerely,

[Redacted – Regulation 13 Personal Data]

Historic Environment Inspectorate / Arolygiaeth yr Amgylchedd Hanesyddol  
under authority of Jack Sargeant MS – Minister for Culture, Skills and Social  
Partnership

**HISTORIC ENVIRONMENT (WALES) ACT 2023**  
**APPLICATION FOR SCHEDULED MONUMENT CONSENT**  
**Pumpsaint Roman Fort (CM226)**  
**Ref: SMC2857**

**INSPECTOR'S ADVICE**

**1. Policy Context**

- 1.1 An application for scheduled monument consent (SMC) is considered on its own merits in accordance with *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* ([Conservation Principles](#)) and Annex A of *Technical Advice Note 24: [The Historic Environment \(TAN 24\)](#)*. In particular, TAN 24 explains that the main purpose of scheduling is to ensure the preservation of ancient monuments and, when considering an application for SMC, there is a presumption against proposals which would involve significant alteration or cause damage, or which would have a significant impact on the setting of remains. Therefore, applicants are expected to demonstrate that no practicable alternative route or location, avoiding the scheduled area, exists and that the need to undertake works outweighs the presumption in favour of the protection of the scheduled monument.
- 1.2 The Welsh Government's six principles for sustainable management of the historic environment in Wales are also used as a guide when considering applications for scheduled monument consent. These are:
- Historic assets will be managed to sustain their values.
  - Understanding the significance of historic assets is vital.
  - The historic environment is a shared resource.
  - Everyone will be able to participate in sustaining the historic environment.
  - Decisions about change must be reasonable, transparent and consistent.
  - Documenting and learning from decisions is essential.

**2. Pumpsaint Roman Fort (CM226)**

- 2.1 The following provides a general description of the Scheduled Monument: 'The monument comprises buried features and earthworks representing a Roman fort. The primary Roman fort network was designed and constructed by the Roman army for the purpose of military conquest and rule. The fort, originally probably measuring c.150m x 125m, and enclosing 1.9ha, was founded in the mid AD 70s, and was reduced in size to c.0.9ha c. AD 100, before apparently being abandoned by the AD 120s, a fairly typical chronological range. The fort may have had a special function in relation to the nearby Dolaucothi gold mines. Excavations within the fort, west of the main A482 both north and south of the Dolaucothi Arms, have revealed a number of phases of internal buildings, including a granary, as well as a well/cistern, and a burnt timber structure in a

2m-deep pit which was dated to the later 3rd or early 4th century AD, raising interesting questions about the nature of later Roman occupation on the site, traces of which are otherwise extremely elusive. Geophysical survey in unexcavated areas suggests that further structures, including a probable bath house on the eastern outskirts, remain to be found here.

The monument is of national importance for its potential to enhance our knowledge of Roman military organisation. The monument forms an important element within the wider context of the Roman occupation of Wales and the structures may contain well preserved archaeological evidence concerning chronology, layout and building techniques.

The scheduled area comprises the remains described and areas around them within which related evidence may be expected to survive.'

### **3. The Application**

- 3.1 This application for scheduled monument consent involves (i) the localised reduction and building up of the ground and (ii) the construction of a temporary trackway to facilitate the delivery, maintenance and decommissioning of a wind farm during its operational lifetime.
- 3.2 This application has been informed by pre-application discussions with Cadw's Senior Inspector of Ancient Monuments and the results of two phases of archaeological evaluation undertaken by Heneb in May 2024 and March 2025.
- 3.3 The works detailed in this application form part of a future DNS planning application (DNS CAS-02650-B0P0M9). PEDW issued an EIA Scoping Direction in November 2023, but an application has not yet been submitted.
- 3.4 There are three potential wind farm schemes that would benefit from the junction improvements in this scheduled monument consent application. A parallel SMC application (ref.: SMC2878) has been submitted by Galileo for the Bryn Cadwgan Energy Park in case the DNS application for the wind farm promoter in this SMC application is unsuccessful. The third wind farm developer (Bute Energy) has not yet submitted a SMC application.

### **4. Assessment**

- 4.1 This application for scheduled monument consent is for enabling works for the Waun Maenllwyd Wind Energy Hub. Alternative delivery routes to the proposed wind farm site were discussed during the pre-application consultation between Cadw and Belltown Power. An analysis undertaken by Pell Frischmann of the available delivery ports and road network demonstrated that the access route via Pumpsaint had the fewest constraints, albeit requiring junction improvements to allow the transportation vehicles carrying components up to 76.5m in length and 84 tonnes in weight to pass.

- 4.2 The proposed road junction improvements coincide with the southern entrance to the Roman fort where earlier investigations identified significant in situ archaeological evidence and the potential for further well-preserved Roman remains. SMC was granted in 2023 for an archaeological evaluation to take place to determine the presence, character, significance and depth of any buried archaeology where groundworks were proposed. Undertaken by Heneb in May 2024, the trenches revealed evidence for a buried Roman road surface and defensive ditch deposits above the required formation level. The applicant re-designed the scheme to avoid this evidence. A second phase of archaeological evaluation, again undertaken by Heneb in March 2025, investigated areas that were above the required formation level of the revised scheme and would need to be removed. The investigation of Trench 3 identified a similar deposit to that identified in Trench 1 excavated in 2024 with Roman finds, but no Roman finds were found in Trench 3. There is potential that this deposit may relate to the crossroads of the *Via Sagularis* and main NW-SE aligned road within the Roman fort, but this is not yet verified.
- 4.3 The applicant proposes to establish a new vehicle turning circle to the north of the forestry track across an existing playing field to reduce the requirement for ground reduction that would disturb known archaeological deposits within the scheduled area. This design also avoids a registered park and garden. The new stretch of track rejoins the existing forestry track c. 300m to the E of the scheduled monument. The new access track would comprise a removable 'floating' design and aluminium trackway plates. It would measure up to 1m in height and 10m in width. The track and the arc required for the oversail of wind turbine components requires the removal of natural vegetation, the temporary lowering of a dry-stone wall and limited areas of ground reprofiling, both building up, and as previously mentioned, two areas of localised ground reduction.
- 4.4 The proposed engineering solution has been designed to minimise any imposed vehicular loads on the buried archaeological evidence to avoid compression damage and changes to soil structure that might affect the preservation of archaeological evidence. A geotechnical site investigation undertaken by Pell Frischmann concluded that the maximum gross vehicle weight of 135 tonnes and maximum axle weight of 11.8 tonnes travelling on aluminium trackway plates would have an equivalent ground pressure to that imparted by a pedestrian. This is acceptable.
- 4.5 Two areas of overburden reduction are proposed. Following the identification of archaeological evidence during the evaluation phase, the applicant submitted a written scheme of investigation for archaeological monitoring and recording prepared by Heneb as a control to ensure that any archaeological evidence encountered during the ground works for the 'floating' track will be identified. All work would cease if further Roman archaeological evidence was identified and Cadw's Senior Inspector of Ancient Monuments would be invited to inspect. The Inspector would determine the significance of the remains and instruct on next steps, which may require a localised re-design of the scheme to accommodate the evidence. I confirm that the nomination of Heneb as fieldwork contractor and their proposed written scheme of investigation are





acceptable. Cadw's Inspector will monitor the fieldwork and approve the final report. This is acceptable.

- 4.7 The applicant proposes that the 'floating' track is left in situ for the operational life of the wind farm scheme so that it can be maintained and used for decommissioning. Originally, the proposal had been for the track to be removed, but it may be required for maintenance by this and other successful DNS applicants. The track will not impact directly on any buried archaeological evidence. The track will comprise a new visible feature within the scheduled area and will impact on the monument's setting. However, as a long and low feature that will re-vegetate, the impact will be minor. The track would be removed at the end of the wind farm's operational life and the ground returned to its former condition, so the impact is temporary and reversible. This is acceptable.
- 4.8 The applicant is in discussion with a landowner regarding the decommissioning and relocation of an existing children's play area and quoits pitch and the creation of a new fence line which are required by the construction of the new track. The details and locations are not yet known, but these can be dealt with as a variation of this consent. The foundations can be designed to avoid any buried archaeological evidence through prior archaeological evaluation and is not a concern.
- 4.9 I confirm that the proposals would not involve significant alteration or cause damage to the scheduled monument, nor have a significant impact on the monument's setting.

## **5. Recommendation**

- 5.1 I recommend that this application for scheduled monument consent is approved, subject to the proposed conditions set in section six below.

## **6. Proposed Conditions**

- 6.1 The applicant shall provide Cadw with at least five working days' advance notice of commencement of works on site and will afford access at all operational times to any Cadw official or archaeologist nominated by Cadw to monitor progress of the works.
- 6.2 The approved works shall be carried out strictly in accordance with the application form, plans and documents as listed below. No variations are permitted unless they have been authorised in advance in writing by Cadw.



Number	Document / plan	Reference Number (if applicable)	Date
1	SMC application form signed by [Redacted – Regulation 13 Personal Data], Hampton Heritage Design & Consultancy on behalf of Belltown Power and The National Trust and dated 2025		30/06/2025
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- 6.3 A digital copy of the draft watching brief report shall be submitted to Cadw for approval within eight weeks of the archaeological fieldwork being completed<sup>3</sup>.
- 6.4 A digital copy of the approved watching brief report shall be submitted to the regional Historic Environment Record and National Monuments Record of Wales to be incorporated into these public records<sup>4</sup>, and the applicant shall inform Cadw when this has been completed.
- 6.5 Cadw shall be invited to attend a site meeting prior to the commencement of the project to review the programme and arrangements that have been established for archaeological mitigation and recording.

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<sup>3</sup> *Cadw will retain a copy of the watching brief report for our records.*

<sup>4</sup> Cadw requires formal confirmation of report deposit to discharge condition.



- 6.6 That upon completion of the project the applicant will produce a completion report including an annotated photographic record detailing the site before, during and after works took place and including final versions of plans and elevations as built. The draft should be sent to Cadw in digital format for approval within 25 working days of the works being completed.
- 6.7 Any historic or archaeological features not previously identified which are revealed when carrying out the works shall be retained *in situ* and reported to Cadw within two working days. Works shall be halted in the area/part of the site affected until provision has been made for retention and/or recording of the feature by a suitably qualified archaeologist in accordance with details submitted to and approved in writing in advance by Cadw.

**Name of Inspector:** [Redacted – Regulation 13 Personal Data]

**Date:** 28 August 2025



**COMPLETION NOTICE****Pumpsaint Roman Fort (CM226)****Ref: SMC2857**

<b>Conditions</b>	<b>Date</b>	<b>Signature</b>
Five working days' advance notice of commencement of works		
Cadw invited to site meeting		
Draft watching brief report within 8 weeks		
Approved watching brief report shall be submitted to the regional Historic Environment Record and National Monuments Record of Wales		
Completion of works on site		
Submission of Completion report to Cadw		

Applicant Name:

Signature:

When all work has been completed and the conditions have been discharged, please complete and return this completion notice to Cadw at [scheduledmonuments@gov.wales](mailto:scheduledmonuments@gov.wales)

