

ATISN 26225 Doc 02 – Scoping opinion advice to PEDW

PEDW	Eich cyfeirnod Your reference	CAS-02917-K8D5Z2
Sent by email: PEDW.Infrastructure@gov.wales	Ein cyfeirnod Our reference	
	Dyddiad Date	25 January 2024
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Dear Sir / Madam

Bryn Cadwgan Energy Park 0PP - DNS EIA Scoping Consultation Llandovery, Wales SA20 REF: CAS-02917-K8D5Z2

Thank you for your letter asking for Cadw's view on the above.

Cadw, as the Welsh Government's historic environment service, has assessed the characteristics of this proposed development and its location within the historic environment. In particular, the likely impact on designated or registered historic assets of national importance. In assessing if the likely impact of the development is significant Cadw has considered the extent to which the proposals affect those nationally important historic assets that form the historic environment, including scheduled ancient monuments, listed buildings, registered historic parks, gardens and landscapes.

These views are provided without prejudice to the Welsh Government's consideration of the matter, should it come before it formally for determination.

Advice

This advice is given in response to scoping opinion as to the contents of an Environmental Impact Assessment (EIA) that will be submitted in support of an application for the Bryn Cadwgan Energy Park.

Scheduled Monuments

Within the application area:

CM218 Cairns & Stone Circle S of Pen-y-Raglan-Wynt
CM200 Dolaucothi Roman Aqueduct
CM224 Cairn Groups on Garn Fawr

Registered Historic Landscape:

HLW (D) 8 Dolaucothi

Within a 5km developer ZTV to blade tip:

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CD136 Stone Circle and Associated Structures on Bryn y Gorlan
CD199 Cynau Long Hut
CD200 Cors Blaen Cothi Deserted Rural Settlement
CD210 Round Cairns c. 400m SE of Lan Fawr
CD223 Crug Round Cairn
CD240 Penrhiwllwydog Round Cairn
CD241 Cefn Cnwcheithinog Standing Stone
CD253 Pen y Gurnos Round Barrow
CD254 Blaen Nant-y-Rhiw Round Cairn
CD255 Carn Saith-Wraig Round Cairns
CM168 Esgair Ffraith Round Cairns
CM169 Carn Fawr Round Cairn
CM208 Dolaucothi Gold Mines
CM210 Annell Aqueduct (lower section)
CM211 Annell Aqueduct (upper section)
CM212 Hut at upper end of Annell Roman Aqueduct
CM213 Cothi Roman Aqueduct
CM215 Nant-y-Mwyn Lead Mine Engine House, Rhandir-Mwyn
CM237 Roman Water Tank E of Brunant Farm
CM298 Esgair Gaeo Deserted Rural Settlement
CM299 Burnt Mound on Esgair Ferchon
CM300 Maen Bach Standing Stone
CM301 Mynydd Mallaen Standing Stone
CM302 Crugiau Merched Cairns
CM304 Cefn y Bryn Ring Cairn
CM305 Pen Cerrigiddos Round Cairns
CM339 Banc Maes-yr-Haidd barrows
CM341 Cerrig Cedny round cairn
CM342 Carn Twrch round cairn
CM352 Troedrhiwhir Mountain ring cairn
CM353 Troedrhiwhir standing stone
CM363 Craig Twrch round cairn
CM364 Carn Nant-yr-ast round cairn
CM365 Bryn Bedd round barrow
CM391 Chambered Tomb 500m SW of Bryn Mawr (proposed scheduling)

Registered Parks and Gardens:

PGW(Dy)7(CAM) Dolaucothi

Registered Historic Landscape:

HLW (D) 5 Tywi Valley

Listed Buildings:

10924	Ystradffin	II
16246	Brynteg	II
16247	Barn Range at Brynteg	II
16248	Pant-Coy	II
16249	Range forward to right of Pant-Coy	II
16258	Dolaucothi Home Farm	II

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16259	Stable Range at Dolaucothi Farm	II
16266	Salem Baptist Chapel	II
16267	Ty-Newydd	II
16268	Ty'n-y-Corn	II
19018	Nant y Bai Mill	II
21403	Broncwr	II
21411	Church of St Barnabas	II
21417	Engine house and chimney at Rhandirmwyn lead-mine	II

The scoping request is accompanied by a scoping report produced by Ramboll, with Chapter 5 Cultural Heritage prepared by AOC. This outlines the proposed methodologies that will be used to compile this section of the EIA. It concludes with a request for answers to six questions.

Question 1. Are there any additional sources of baseline information which should be referred to, to inform the appraisal of effects on cultural heritage?

It is recommended that the National Trust's archaeologists are consulted in regard to any archaeological surveys they have carried out on their Dolaucothi estate and surrounding area.

Question 2. Are the proposals to scope out certain elements of cultural heritage from detailed assessment appropriate?

Cadw agree that historic assets located outside the ZTV can be scoped out of the assessment. However, the above designated historic assets are inside 5km of the application area and within the applicant's ZTV. As such, we expect that the impact of the proposed windfarm on all of these designated historic assets will be assessed in accordance with the Welsh Government guidance given in the document "The Setting of Historic Assets in Wales". We would expect a stage 1 assessment to be carried out for all of the above designated historic assets, which will determine the need, if necessary, for stages 2 to 4 to be carried out for specific historic assets. The results of the stage 1 assessment should be included in the EIA, possibly as an appendix.

Question 3. Is the proposed methodology clear and appropriate?

No, there is no detailed information in regard to any additional investigations that may be required to identify buried archaeological sites that may be located in the application area to ensure that their nature, extent and significance can be determined. These surveys could include geophysical survey and archaeological evaluation. It is recommended that Cadw and the Dyfed Archaeological Trust are consulted once the draft desk-based assessment and walkover survey have been completed to agree if there is a need for further surveys.

The requirement for geophysical survey would be triggered by clusters of surface monuments suggesting high levels of nearby activity, typically prehistoric funerary and ritual monuments, for which associated sub-surface archaeology may be present, but cannot be properly quantified and located. It may also be triggered where prior surveys cannot accurately define the nature of surface or sub-surface features without retrieving more information. If geophysical anomalies are located but are not

diagnostic enough to allow informed opinions on dating, function, level of preservation and importance then additional intervention by targeted evaluation trenching may also be required within the pre-determination assessment stage and in accordance with Planning Policy Wales and TAN24.

The impact on intact peat deposits which may contain important paleoenvironmental evidence and artefacts of prehistoric date should be assessed. There may be some surface exposures of peat, boggy areas and pools within the development area which may indicate the sub-surface presence of peat deposits. Normally the peat deposit depths and extent will be mapped as part of the NRW Peat Management Plan requirements and in general archaeological interest will be in regard to any peat deposits deeper than 0.4m although shallow deposits can also be archaeologically significant. The turbine and infrastructure layout should seek to avoid all peat deposits. Where significant peat deposits cannot be avoided a suitable scheme of sampling, analysis, dating and reporting will need to be completed using appropriate sampling techniques advised by a paleoenvironmental/geoarchaeological specialist.

A realistic time period should be set aside to complete the archaeological assessment, reporting and mitigation discussion before the application is formally submitted for examination and in accordance with guidance on pre-determination archaeological evaluation set out in Technical Advice Note 24 (May 2017): Paragraph 4.7 and Planning Policy Wales (Feb 2021): Paragraph 6.1.26. Failure to complete the appropriate surveys may result in delays at the examination stage if additional information is required. The applicant should therefore adjust their application submission dates if necessary to ensure these surveys are fully completed.

Question 4. Are there any assets beyond the proposed study areas that consultees would like to see scoped into the assessment?

We are not currently aware of any assets beyond the proposed study areas that will need to be considered in the study.

Questions 5. Are there any visualisations that the consultees would like to see as part of the assessment?

We would expect visualisations to be provided of views from all scheduled monuments inside the application area, in particular visualisations of the views between CM218 and the different parts of CM224 should be included.

Question 6. An ASIDOHL 2 assessment will be produced relation to the impact on the Registered Historic Landscape in the Site. No direct impacts on the Registered Historic Landscape are currently proposed and therefore 'Stage 2' of the assessment process will be excluded. Are consultees in agreement that 'Stage 2' can be excluded from the ASIDOHL 2 assessment?

Stage 2 of the ASIDOHL 2 assessment can only be removed from the assessment if no works connected to the proposed development, including access track and cables, will be located inside the boundaries of the registered historic landscape.

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Finally, it should be noted that the Historic Environment (Wales) Act 2023 will have been enacted before the EIA is completed and that many associated documents, such as TAN 24, will be updated in accordance with the Act.

Yours sincerely

[Redacted (Cadw Casework/Grants Manager) – Regulation 13 Personal Data]
Historic Environment Branch