



Head of Planning
Neath Port Talbot County Borough Council
The Quays
Brunel Way
Baglan Energy Park
NEATH
SA11 2GG

18th June 2020

FAO: Steve Ball

Dear Sir

Re: Construction of Complementary Restoration Earthworks to Create 2 Looped Landform Platforms (Part in Cutting and Part on Embankment) with Associated Drainage Infrastructure and Areas of Landscaping and Habitat Creation to Create a Flexible and Adaptable Area of Land that could be used for a Variety of Uses including Agriculture, Nature Conservation, Leisure, Tourism and Industrial, Research and Development/Business uses (Potentially Including a Proposed Rail Testing, Research and Development and Storage Facility). (Cross-boundary Application - see Powys CC Application ref. 20/0738/FUL) | Land at and Surrounding Nant Helen Open Cast Coal Site, Powys & Onllwyn Distribution Centre, Neath Port Talbot.

Thank you for notifying us of this application, consequently we have consulted the detailed information contained on your website. **The proposal will require historic environment mitigation.**

The supporting documentation includes an Environmental Statement, Chapter 8 Cultural Heritage of which addresses the potential impact of the proposal on the Historic Environment, and the ES also includes the supporting desk-based assessment and figures. This work was undertaken to an agreed methodology, stated in the Written Scheme of Investigation (November 2019), and meets the current professional standards.

In assessing the information concerning the historic environment, historic assets of both designated and non-designated status were identified. The Scheduled Monument of the Tramroad at Ystradgynlais (Cadw reference GM399) will be directly affected by elements of the proposal with a significant adverse effect, and as noted within the document, Scheduled Monument Consent must be obtained from Cadw prior to any development works to the Scheduled Monument, and we understand that the SMC application is in process. Should SMC be granted then any subsequent archaeological mitigation should be undertaken to an agreed methodology within a written scheme.

Non-designated historic assets within the development boundary that will be affected are listed in the assessment and ES chapter, and detailed in the mitigation section 8.10 and the tables 8.2a&b, and 8.4. This details that areas named would be subject to an archaeological strip, map and record, with a watching brief on Areas B and C (i.e. those unaffected by the modern mining operations). Some of

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the named features fall within the area of Powys, and therefore are within the Clwyd Powys Archaeological Trust. This also includes the transect of Area C regarding peat and environmental sampling.

For those features which fall within GGAT's area and remit, we concur with the proposed mitigation and recommendations and recommend that the programme of archaeological work as mitigation should be undertaken to an agreed methodology within a written scheme, to be submitted to us as the archaeological advisors to Neath Port Talbot. This is following the Welsh Government Legislation and Policy. We therefore recommend a condition to be attached to any consent granted, recommending the submission of the written scheme and the programme of work to be implemented.

The written scheme will also need to take account of the *Guidance for the Submission of Data to the Welsh Historic Environment Records (HERs) 2018*; and the *National Standard and Guidance to Best Practice for Collecting and Depositing Archaeological Archives in Wales 2017*.

This will ensure 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 recommendation and following the guidance in Planning Policy Wales Edition 10, December 2018, 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 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.

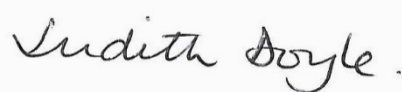
Reason: To identify and record any features of archaeological interest discovered during the works, in order to mitigate the impact of the works on the archaeological resource.

We also recommend that a note should be attached to any planning consent explaining that:

The archaeological work must be undertaken to the appropriate Standard and Guidance set by Chartered Institute for Archaeologists (CIfA), (www.archaeologists.net/codes/cifa) and it is our Policy to recommend that it is carried out either by a CIfA Registered Organisation (www.archaeologists.net/ro) or an accredited MCIfA Member.

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

Yours faithfully

A handwritten signature in black ink that reads "Judith Doyle". The signature is written in a cursive style with a large 'J' and 'D'.

Judith Doyle
Archaeological Planning Officer