Margam, Port Talbot, National Grid Upgrade Works – Substation Extension

Historic Environment Desk Based Assessment (Heritage Statement)

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Executive Summary

Stantec UK Limited was commissioned by National Grid Electricity Transmission to prepare an Historic Environment Desk-Based Assessment (HEDBA) (alternatively referred to as a Heritage Statement) to outline baseline conditions and assess potential effects upon the historic environment from the proposed extension of Margam substation. A planning application will be submitted for the Scheme which this HEDBA will accompany. The Site comprises the existing Margam substation and undeveloped reclaimed marshland pasture, much of which is designated as a local Site of Importance for Nature Conservation.

The Scheme will not result in direct impacts upon any designated historic assets or any indirect changes to setting that will impact upon their heritage interests and significance.

Extant landscape features of post-medieval and/or possible medieval date have been identified within the Site. These include former drainage ditches known as the Upper Mother Ditch and Wal Ddu, and the line of the Heol y Deiliaid which extends along the southern boundary of the Site. This former road is believed to follow the route of a medieval paved causeway connecting Hen Biniwn Grange (SN:87), which formerly stood to the west of the Site, to Margam Abbey (SN: 6) to the east. The line of the road appears to be preserved by two parallel ditches, and it is possible that further below ground remains may survive. Based on existing understanding, none of the known archaeological remains are of sufficient value to be considered nationally significant (equivalent to a scheduled monument). However, there is a potential for further as yet unknown archaeological remains to be present.

Tidal flat deposits containing peat horizons are recorded within the Site. These deposit sequences are of palaeoenvironmental interest and the anaerobic conditions within peat and alluvium also provide favourable conditions for the preservation of organic archaeological remains such as those made of wood, leather and animal and plant fibres.

Intrusive works have the potential to have an impact (damage or remove) upon known and as yet unknown archaeological remains and/or palaeoenvironmental deposits within their footprint. This includes, but is not limited to, piling of foundations for the substation, groundworks for associated infrastructure including the amenity building and Distribution Network Operator (DNO) building, stripping for the creation of permanent access road, and excavation of the attenuation basin. The Heol y Deiliaid and Upper Mother Ditch are located outside the intrusive footprint of proposed works and will not be impacted by the Scheme, although works for the access track extend up to the edge of the Wal Ddu and have the potential to impact upon deposits associated with this feature. Some minor drainage ditches/former boundaries will also be partially impacted.

Consultation was undertaken with Heneb which agreed that any requisite mitigation measures can be carried out post-determination, with no requirement for pre-determination evaluation. It was proposed that this mitigation will comprise either an archaeological monitoring and recording action maintained during intrusive works and/or a strip, map, sample excavation, as appropriate. Further consultation will need to be carried out to determine the detailed scope. It was also established that an archaeological monitoring and recording action is to be maintained during any works affecting historically ‘important’ hedgerows.

The Scheme will result in the loss of the historic reclaimed agricultural land within the footprint of the proposed substation extension. However, this impact will be confined to a small area adjacent to the existing industrial landscape and will therefore not detract from the legibility of the wider historic landscape.

Crynodeb

Cafodd Stantec UK ei comisiynu gan National Grid Electricity Transmission i baratoi asesiad wrth y desg o’r amgylchedd hanesyddol i crynhoi’r amodau sydd yn bodoli ar y safle ar hyn o bryd, ac assessu’r effeithiau sydd yn posib o rhan estyniad arfaethedig i is-orsaf trydanol Margam. Bydd cais cynllunio yn cael ei wneud am yr estyniad i’r is-orsaf. Mae’r Safle yn cynnwys is-orsaf trydanol Margam, yn ogystal â porfa corsydd ar tir wedi’i adfer o’r môr sydd yn cynnwys Safle o Bwysigrwydd Cadwreath Natur.

Ni fydd y datblygiad arfaethedig yn effeithio ar unrhyw asedion hanesyddol dynodedig, na fydd o’n achosi newidiadau anuniogyrchol ar eu diddordeb a’i phywsigrwydd.

Mae hen ffosydd draenio (o’r enw Upper Mother Ditch a Wal Ddu) wedi'u nodi ar y Safle – mae rhain yn dyddion o’r adeg ôl-ganoloesol a/neu ganoloesol. Hefyd,mae llinell Heol y Deiliaid yn rhedeg ar hyd y ffin ddeheuol ySafle. Credir bod yr hen ffordd hon yn dilyn llinell sarn canoloesol a oedd yn cysylltu Maenor Hen Biniwn (SN:87, i’r gorllewin o’r Safle) ag Abaty Margam (SN:6, i’r dwyrain). Mae llinell y ffordd hon wedi’i chadw gan dwy ffos paralel, ac mae’n bosib bod mwy o dystiolaeth danddaearol yn bodoli.

Nid oes yr un o'r gweddillion archaeolegol hysbys o werth digonol i fod o arwyddocâd cenedlaethol (yn gyfatebol i cofadeiliau rhestredig). Fodd bynnag, mae potensial y bydd rhs agor o olion archaeolegol anhysbys yn bresennol.

Mae gwaddodion llanwol sydd yn cynwys waddodion mawn wedi’i recordio ar y Safle, sydd o diddordeb palaeoamgylcheddol. Mae amodau anaerobig yn y mawn a’r llifwaddod yn creu amodau ffafriol ar gyfer cadw defnydd organig fel pren, lledar, a ffibrau anifeiliaid a phlanhigion.

Fydd y prosiect yn achosi gloddweithiau sydd efo’r potensial i effeithio unrhyw olion archaeolegol a/neu unrhyw gwaddodion palaeoamgylcheddol ar y safle. Mae hon yn cynwys (ond nid yn gyfynedig i) peilio ar gyfer sylfeini’r adeiladau, creu basn gwanhau, a thynny uwchbridd ar gyfer ffyrdd a chyflesterau adeiladu dros-dro. Mae Heol y Deiliaid a Upper Mother Ditch tu allan i ardal y gwaith cloddio arfaethedig, ac felly ni fydd yn cael ei effeithio gan y prosiect.

Yn dilyn cysylltiad pellach â Heneb, cytunwyd y gellir gweithredu unrhyw fesurau lliniaru gofynnol ar ôl penderfyniad yr awdurdod cynllynio lleol, heb unrhyw ofyniad am werthusiad cyn y penderfyniad. Cynigiwyd y byddai'r mesurau lliniaru hyn yn cynnwys naill ai gweithred monitro a chofnodi archaeolegol a gynhelir yn ystod gwaith ymwthiol, a/neu gloddio stribed, map, sampl, yn ôl yr angen. Bydd angen cysylltiad pellach â Heneb i benderfynu ar manylion y fanyleb. Cytunwyd hefyd y dylid cynnal camau monitro a chofnodi archaeolegol yn ystod unrhyw waith sy'n effeithio ar wrychoedd hanesyddol bwysig.

Fydd y prosiect yn achosi’r colliad o tir amaethyddol hanesyddol wedi’i adfer o’r môr tu fewn i ardal yr is-orsaf. Fodd bynnag, bydd yr effaith hon yn gyfyngedig i ardal fach gerllaw'r tirwedd ddiwydiannol bresennol, ac ni fydd yn tynnu oddi ar eglurder y dirwedd hanesyddol ehangach.

1 Introduction

1.1 Project Background

1.1.1 Stantec UK Limited was commissioned by National Grid Electricity Transmission (the Client) to prepare an Historic Environment Desk-Based Assessment (HEDBA) (alternatively referred to as a Heritage Statement) to outline baseline conditions and assess potential effects upon the historic environment from the proposed extension of Margam electricity substation (the 'Scheme') at Margam, Port Talbot, South Wales, centred at National Grid Reference (NGR): SS 78561 86377 (the 'Site').

1.1.2 A negative Environmental Impact Assessment (EIA) Screening Opinion was provided by Neath Port Talbot Council (NPTC). A planning application will be submitted for the proposed substation which this HEDBA will accompany.

1.1.3 This assessment has been prepared in accordance with a Written Scheme of Investigation (WSI) approved by Heneb: The Trust for Welsh Archaeology (approved by Rob Dunning 14/07/2025). A copy of the WSI was also provided to and acknowledged by Cadw (Neil Maylan 14/07/2025).

1.2 Location, Topography and Geology

1.2.1 The Site is located within Port Talbot, South Wales, approximately 14km south-east of Swansea (Figure 1). It comprises an area of approximately 15 hectares (ha), encompassing the existing Margam substation, which comprises an enclosed complex of approximately 0.7ha and is up to 14.6m in height, an approximately 14.8 ha area of adjacent reclaimed wetland, and an existing access track between the substation and Cefn Gwrgan Road (Plates 1 and 2). Numerous drainage ditches dissect the wetland area including the Upper Mother Ditch, which forms the northern and eastern boundaries of the Site, and the Wal Ddu which passes through the northern part of the Site. These ditches are also defined in some areas by hedgerows and scrub. The Swansea to London railway line is directly west of the substation, with the Tata steel works complex beyond, and an area of industrial land comprising the British Oxygen Company (BOC) gas plant, to the south-east. Further areas of reclaimed wetland lie to the immediate east and south, whilst land to the north of the Upper Mother Ditch is currently used as a golf course.

1.2.2 The Site is situated within an area of relatively level low-lying reclaimed wetland situated at approximately 3m above Ordnance Datum (aOD).

1.2.3 The bedrock geology underlying the Site is South Wales Middle Coal Measures Formation which consists of sedimentary mudstone, siltstone and sandstone formed between 319 and 309.5 million years ago during the Carboniferous period. Tidal Flat deposits consisting of clay, silt and sand overlie the bedrock. These superficial deposits were formed between 11.8 thousand years ago and the present during the Quaternary period and are archaeologically and palaeoenvironmentally relevant.

Plate1. View looking toward the Site from Margam Mountains, facing west

Plate 2. View looking across the Site facing west. Existing substation visible on far right of photo

1.2.4 Geotechnical site investigations, including five boreholes and eight test pits, were carried out across the Site in November 2008 by Jacobs Engineering. Further investigations, comprising 12 boreholes and 20 test pits, were undertaken in August and September 2024 by Geotechnics Limited. These investigations confirm the presence of deposits of clay and silt overlying gravels, mudstone and coal. They also revealed the presence of peat deposits within

the Tidal Flat deposits across most of the Site. The top of the peat deposit varies although was recorded as shallow as 0.2 m BGL (2.75m AOD). The deposit varies in thickness to up to 4.7m.

1.3 Aims and Objectives

1.3.1 The purpose of this HEDBA is to provide, as far as reasonably possible from existing records and observations, an understanding of the historic environment resource within the Site and the surrounding Study Area in order to formulate:

- an assessment of the potential for historic assets to survive within the Site including assessment of previous impacts;
- an assessment of the significance of the known or predicted historic assets considering their evidential, historic, aesthetic and communal interest;
- an assessment of the impact of the Scheme or other land use changes on the significance of historic assets including any changes which impact the contribution of their setting; and
- proposals for any further archaeological investigation and mitigation required.

2 Regulatory and Policy Context

2.1 Introduction

2.1.1 There is national legislation, planning policy and guidance relating to the protection of, and development on, or near historic assets in Wales. Legislation and national, regional and local planning policies in relation to the historic environment and relevant to the Scheme are listed below and further detail is provided in Appendix A.

2.2 Legislation

2.2.1 The following historic environment legislation is relevant to the Scheme:

- Historic Environment (Wales) Act 2023
- Hedgerow Regulations 1997

2.2.2 The Client also has defined heritage obligations under Schedule 9 of the Electricity Act 1989.

2.3 Planning Policy

2.3.1 The Scheme requires planning permission and as such will be subject to national and local planning policy in addition to the above legislation:

National Planning Policy

- Planning Policy Wales (Edition 12, 2024)
- Future Wales: The National Plan 2040 (Llywodraeth Cymru, 2021)
- Technical Advice Note (TAN) 24: The Historic Environment (2017)

Local Planning Policy

- Neath Port Talbot County Borough Council Local Development Plan 2011-2026

3 Methodology

3.1.1 The scope and methodology of this assessment was agreed in consultation with Rob Dunning of Heneb and Neil Maylan of Cadw. A WSI (Stantec 2025) detailing the agreed scope and methodology was approved by Rob Dunning (Heneb) on 14/07/2025.

3.2 Standards and Guidance

3.2.1 This assessment has been carried out in accordance with Planning Policy Wales - TAN 24: The Historic Environment (2017) and the following good practice and guidance documents:

- Chartered Institute for Archaeologists (CIfA) 'Standards and Guidance for Historic Environment Desk-Based Assessments (as revised 2020)
- Cadw's 'Setting of Historic Assets in Wales' (2017)
- Cadw's 'Conservation Principles for the sustainable management of the historic environment in Wales' (2011)
- Heneb's 'Guidance for the Submission of Data to the Heneb Historic Environment Record (HER)' (2024)

3.3 Data Sources

3.3.1 A 1km Study Area has been utilised to identify non-designated historic assets which might be affected by the Scheme and to inform the historic and archaeological background of this assessment. A 3km Study Area has been used to identify designated historic assets that might receive effects from the Scheme. These study areas were agreed by Rob Dunning (Heneb) on 14/07/2025 and are aligned with relevant good practice and guidance documents as outlined in section 3.2.

3.3.2 The following sources were consulted to inform the presence of known historic assets within the Site and Study Areas:

- Cadw's National Historic Assets of Wales (NHAW) for designated historic assets;
- Heneb Historic Environment Record (HHER) for archaeological sites, events, findspots, historic buildings and Historic Landscape Character Areas (HLCA) (HER enquiry reference number: 9147, obtained 02/04/2025);
- Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW) National Monuments Record of Wales (NMRW) for archaeological sites, monuments and buildings (obtained from the Welsh Government's Data Map Wales 22/04/2025);
- West Glamorgan Archive Service and online mapping repositories for Ordnance Survey, Tithe and Estate Maps (as available) and any other relevant historic documentation;
- Aerial photographs as available on RCAHMW, the Welsh Government's Aerial Photography Unit (APU) websites and imagery available on Google Earth;
- LiDAR data as available on the Welsh Government's Data Map Wales;
- Place name evidence;
- Records held by the client or produced as part of the Scheme such as borehole logs and geological/geoarchaeological information; and

- Relevant primary and secondary sources including published and unpublished reports relating to previous archaeological investigations and geotechnical ground investigation works considered relevant.

3.3.3 A Zone of Theoretical Visibility (ZTV) produced for the Site was reviewed to support the identification of designated historic assets within the 3km Study Area that may be susceptible to effects to their setting from the Scheme. The ZTV illustrates the area of theoretical visibility the maximum height of the GIS Hall Building as the tallest proposed element of the Scheme at 11m, using an observer height of 1.6m.

3.3.4 Historic environment data for the Site is displayed on Figures 2-4. Designated historic assets are shown on Figure 2, and HER events and HER and NMRW monuments on Figure 3. Each record has been assigned a unique Stantec Reference Number (SRN). The relevant Cadw Record Numbers (CRN), HHER and NMRW Preferential Reference Numbers (PRN) are included in the gazetteer of heritage records (Appendix B). HLCA data is shown on Figure 4.

3.3.5 Welsh Government LiDAR Digital Terrain Model (DTM) data for Ordnance Survey Sheet SS78, surveyed at 1m intervals, was downloaded to inform this assessment. The DTM data was processed using the Relief Visualisation Toolkit (RVT) to create a range of visualisations. A simple local relief model visualisation and interpretation is shown on Figure 5.

3.4 Walkover

3.4.1 A walkover survey of the Site was carried out on 8-9th May 2025 to assess the current character and condition of the Site, to identify known, and any unknown, extant archaeological earthworks within the footprint of the Scheme, and to inform the assessment of previous impacts. Designated historic assets considered to have potential to be affected by the Scheme, were also visited or viewed from publicly accessible areas to assess their setting, potential intervisibility with the Site and susceptibility to receive impacts. Observations made during the walkover survey are incorporated into baseline below.

3.5 Assessment of Significance

3.5.1 TAN 24 (2017) recommends that Cadw's 'Conservation Principles for the sustainable management of the historic environment in Wales' (2011) is utilised in determining the significance of historic assets which might be impacted by development. Conservation Principles defines the heritage values of historic assets as follows:

- **Evidential value:** the extent to which the physical fabric tells how and when a historic asset was made, how it was used and how it has changed over time. There may be buried or obscured elements associated with your historic asset which may also be an important potential source of evidence.

- **Historic value:** a historic asset may illustrate a particular past way of life or be associated with a specific person or event; there may be physical evidence for these connections which it could be important to retain.

- **Aesthetic Value:** the design, construction and craftsmanship of a historic asset. This can also include setting and views to and from the historic asset, which may have changed through time.

- **Communal Value:** a historic asset may have particular significance to people for its commemorative, symbolic or spiritual value, or for the part it has played in local cultural or public life. This will be particularly important in the case of buildings in public use or sites where public access must be maintained or improved.

3.6 The Setting of Historic Assets

3.6.1 Cadw's 'Setting of Historic Assets in Wales' (2017) outlines the principles recommended for assessing the impacts of development or land management proposals within the settings of World Heritage Sites, scheduled monuments, listed buildings, registered historic parks and gardens and conservation areas, whilst being applicable to all individual assets irrespective of designation.

3.6.2 In defining 'setting' Cadw states 'the setting of a historic asset includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive, negative or neutral contribution to the significance of an asset (Cadw 2017, p2).

3.6.3 In assessing non-physical effects on the significance of historic assets, Cadw (2017) recommend a four-stage approach:

- Stage 1: Identify the historic assets that might be affected by a proposed change or development.
- Stage 2: Define and analyse the settings to understand how they contribute to the significance of the historic assets and, in particular, the ways in which the assets are understood, appreciated and experience.
- Stage 3: Evaluate the potential impact of a proposed change or development on that significance.
- Stage 4: If necessary, consider options to mitigate or improve the potential impact of a proposed change or development on that significance.

3.7 Assumptions and Limitations

3.7.1 Data used to compile this report consists of secondary information derived from a variety of sources. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

3.7.2 The records held by the HHER and NMRW are not a record of all surviving historic assets, but a record of the discovery of a wide range of archaeological and historical components of the historic environment, usually driven by development in a particular area. The information held within them is not complete and does not preclude the subsequent discovery of further historic assets that are, at present, unknown, notably buried assets.

3.7.3 The West Glamorgan Archives Centre was visited on the 09/05/2025. However, no pre-Ordnance Survey maps available included coverage of the Site. It is understood that the majority of mapping for the area remains in the possession of Margam Estate or the former owner and is not publicly available.

4 Historical and Archaeological Baseline

4.1 Introduction

4.1.1 The following section identifies the known historic assets within the Study Areas. These were identified from sources listed in section 3. In accordance with Stage 1 of Cadw's Setting of Historic Assets in Wales (2017) this section also identifies historic assets that have the potential to receive effects to their significance through changes to their setting as a result of the Scheme. All designated assets within the 3km Study Area were considered as part of Stage 1, with all scoped out of further detailed assessment owing to the lack of material contribution made by the Site to their significance as part of their setting This scoping exercise is provided as Appendix C.

4.2 Designated Historic Assets

Archaeology

4.2.1 There are no designated archaeological remains (scheduled monuments) located within the Site.

4.2.2 Within the 3km Study Area there are eleven scheduled monuments (Figure 2). The closest of these to the Site is the Chain Home Low Radar Station (SN:2) on the hilltop approximately 800m east of the Site. The remaining ten are all located over 1km from the Site and comprise prehistoric sites, extant medieval buildings, and a collection of medieval sculptured stones.

4.2.3 As detailed in Appendix C, none of these scheduled monuments have the potential to receive effects upon their significance as a result of changes to their setting associated with the Scheme. Accordingly, these will not be considered for more detailed setting assessment but, where relevant, are discussed and referred to by period within the baseline below.

Built Historic Assets

4.2.4 There are no designated built historic assets (listed buildings or conservation areas) located within the Site.

4.2.5 Within the 3km Study Area there are 62 designated built historic assets comprising 61 listed buildings and Margam Park Conservation Area (SN:73). The closest of these to the Site are a Grade II listed milepost outside Tollgate Park (SN:69) approximately 180m north of the Site, and a Grade II* Methodist Chapel (SN:22) and associated Grade II vestry (SN:67) and gates, piers and railings (SN:68), approximately 330m north of the Site. The remaining listed buildings are all located over 500m from the Site, concentrated within Margam Park (SN:75) to the east, the centre of which is also a conservation area (SN:73), and within Port Talbot to the north.

4.2.6 As detailed in Appendix C, none of these listed buildings have the potential to receive effects upon their significance as a result of changes to their setting associated with the Scheme. Accordingly, these will not be considered for more detailed setting assessment but, where relevant, are discussed and referred to by period within the baseline below.

Historic Landscapes

Registered Parks and Gardens

4.2.7 There are no registered historic parks and gardens (RHPGs) within the Site.

4.2.8 Within the 3km Study Area there two RHPGs including the Grade I listed Margam Park (SN:75) which comprises a medieval and post-medieval deer and landscape park,

approximately 920m east of the Site, and the Grade II listed Talbot Memorial Park (SN:74) within the centre of Port Talbot, approximately 2.1km north of the Site (Figure 2).

4.2.9 As detailed in Appendix C, both RHPGs are best defined by their key and immediate setting and group value with other assets within them, and do not have the potential to receive effects upon their significance as a result of changes to their setting associated with the Scheme. Accordingly, these will not be considered for more detailed setting assessment but, where relevant, are discussed and referred to by period within the baseline below.

Registered Historic Landscapes

4.2.10 The register of historic landscapes is a non-statutory, advisory register of landscapes of outstanding or special historic interest in Wales. There are two registered landscapes within the 3km Study Area comprising Margam Mountain (SN:77), approximately 690m east of the Site, and Merthyr Mawr, Kenfig & Margam Burrows (SN:76), approximately 1.8km southeast of the Site. Cadw (Neil Maylan 16/04/2025) confirmed that an ASIDOHL2 would not be required for either landscape, although they should be considered in accordance with Cadw's Setting of Historic Assets in Wales (2017). Accordingly, both landscapes were considered as part of Stage 1 of assessment.

4.2.11 As detailed in Appendix C, the Site is not considered to make a material contribution to the interests of either landscape, and accordingly they do not have the potential to receive effects upon their significance as a result of changes to their setting associated with the Scheme. Accordingly, these will not be considered for more detailed setting assessment but, where relevant, are discussed and referred to within the baseline below.

4.3 Previous Archaeological Investigations

4.3.1 A geophysical survey (SN:121), Headland Archaeology 2022) was undertaken in 2022 by Headland Archaeology for Tata Steel on land approximately 650m south east of the Site, in advance of a proposed expansion of the steel works. This survey is not yet recorded by the HHER and is therefore not shown on Figure 3. The surveyed area included the fields to the west of the railway line and north of Heolcae'r-Bont through which the Lower Mother and Middle Mother ditches run. Parallel linear anomalies, interpreted as drainage ditches, were recorded in over half the fields. Many of these correspond with earthworks seen on aerial photography and LiDAR data, however, there are additional drainage features identified on these sources which were not detected during the survey. Modern tracks, pipes and areas of ferrous disturbance relating to the steelworks were also recorded. Beyond these features no other anomalies of potential archaeological origin were identified.

4.3.2 Eight additional archaeological investigations have been undertaken within the 1km Study Area (Figure 3). These investigations provide insight into the archaeology and heritage within the area and are summarised briefly below, with the results also discussed by period where relevant.

4.3.3 Archaeological monitoring (SN: 78, 79, 80) was undertaken by Gwent and Glamorgan Archaeological Trust (GGAT) in 1992 during the works for the Nantgarw-Margam gas pipeline. The HER event records the event points approximately 190m east of the Site although the pipeline route is plotted slightly further to the east approximately 260m from the Site (marked as SN:79). The monitored works included geotechnical test-pits (SN:78), topsoil strip and cutting (SN:79) and pipeline installation (SN:80). The most significant find recorded was the Blaen Crmlyn Coin Hoard which was found outside of the Study Area, approximately 15km east of the Site. The finds within the Study Area were restricted to a small assemblage of worked flints from the south of Margam Park.

4.3.4 Archaeological monitoring was undertaken in two archaeologically sensitive areas during installation of the Marlas to Raos sewage main in 1991 (SN:120, GGAT, 1992). This main runs adjacent to the railway line on its western side until it meets Heolcae'r-Bont approximately 830m southeast of the Site, along which it continues westwards towards Margam Beach. However, it is understood the monitored areas were near Margam Beach

within the western part of the 1km Study Area and near the M4, beyond the 1km Study Area. The deposits encountered during monitoring (the exact location and extent of which is uncertain) were largely windblown sands but in places these were underlain by alternating layers of dark blue estuarine clays and peat layers which were interpreted as representing successive drier and wetter climatic conditions and which have raised potential for the preservation of palaeoenvironmental remains. These deposits are assumed in the report to be of prehistoric date however, no scientific dating was undertaken to confirm this.

4.3.5 An archaeological trial trench evaluation (SN:81, Wessex Archaeology, 2004) was undertaken by Wessex Archaeology on land immediately to the west of junction 38 of the M4 motorway near Margam, approximately 315m east of the Site. Four trenches were excavated, one of which contained two drainage ditches and a spread of stony material containing burnt clay and charcoal flecks which is interpreted as the possible remains of a structure within the vicinity which was burnt down. Alternative interpretations presented in the report include a field clearance cairn or an attempt to consolidate a particularly wet area of ground. A holloway was also recorded, but not excavated, to the south of the evaluated area. This is likely to be the remains of Heol y Deiliaid, the road which is thought to have linked Hen Biniwn Grange (SN:87) with Margam Abbey (SN:6), and which also extended along the southern edge of the Substation Area of the Site.

4.3.6 Archaeological monitoring (SN:82) was undertaken by Rubicon Heritage Services in 2017 during the expansion of Dyffryn School, approximately 470m north of the Site. This identified a mixed deposit of post-medieval and modern industrial iron waste and an area of modern made ground which may have been laid as a foundation for the school tennis courts.

4.3.7 Archaeological monitoring and a small excavation (SN:119, GGAT, 1994) were undertaken by Gwent and Glamorgan Archaeological Trust (GGAT) during the installation of the Port Talbot to Margam Duplicate Main in 1994. Investigations within the vicinity of Margam Park, approximately 730m east of the Site, were targeted on the potential Roman road (SN:86) however, the size and character of the road sections uncovered were more consistent with post-medieval routeways, with one section being interpreted as the remains of a post-medieval track which led to the side entrance of the now demolished Mansell Mansion within the Park. Further features of post-medieval date associated with the Margam Estate were also encountered during the works, including a road, drainage feature and fishponds.

4.4 Prehistoric Period (500,000 BC - AD 43)

4.4.1 The earliest dated evidence for human activity within the 1km Study Area is a Neolithic hand axe (SN:83) which was recovered from the vicinity of the A38 approximately 525m north of the Site.

4.4.2 Two groups of scheduled Bronze Age round barrows, Ergyd Uchaf (SN:3) and Ergyd Isaf (SN:8), are located approximately 2.8km and 1.8km northeast of the site respectively within the Margam Mountain historic landscape (SN:77) which covers land to the east of the Site beyond the M4. Funerary monuments such as cairns and round barrows are one of the most common types of evidence for Bronze Age activity within Wales and are often located in prominent, elevated positions such as those occupied by the Ergyd Isaf and Ergyd Uchaf barrow groups. Further evidence of Bronze Age ritual activity is represented by the scheduled Ty'n-y-Cellar Standing Stone (SN:4), located approximately 2.2km south of the Site.

4.4.3 The Margam Mountain historic landscape is also notable for its concentration of Iron Age hill forts, a number of which form a chain of strongholds along the strategically important routeway which traverses the southern flanks of the mountain. It is possible that these sites were also situated to best exploit the extensive mountain pastures to the north and the coastal plain to the west. There are three Iron Age fort sites within the wider 3km Study Area, all of which are scheduled monuments. Half Moon Camp (SN:5) is an earthwork enclosure located approximately 1.2km from the Site on a spur overlooking Margam Abbey. Mynydd y Castell Camp (SN:9) is a large D-shaped hill fort located within the Margam Park registered park and garden (SN: 74) southeast of Half Moon Camp, approximately 1.7km from the Site. Hen Eglwys Chapel and Defended Enclosure (SN:10) is located approximately mid-way between

Mynydd Castell Camp and Half Moon Camp, approximately 1.3km from the Site, and is notable for the presence of a (Grade II* listed) medieval chapel (SN:18) within its enclosure.

4.4.4 The Merthyr Mawr, Kenfig & Margam Burrows (SN:76) historic landscape is located approximately 1.8km southeast of the Site. This historic coastal landscape, characterised by its extensive littoral dunes, is subdivided into smaller character areas. Evidence for prehistoric activity from the Mesolithic period through to the Iron Age is recorded within the sand dunes in Merthyr Mawr character area, however this is located outside of the 3km Study Area, approximately 10km from the Site. Beyond residual findspots on Margam Sands, there is no known evidence for prehistoric activity , within the Margam Moors character area. However, extensive peat deposits are recorded across the Site which have raised potential for the preservation of palaeoenvironmental remains from the prehistoric period.

4.5 Romano-British Period (43 AD – 410)

4.5.1 There are three records of Romano-British activity within the 1km Study Area, none of which are located within the Site.

4.5.2 A Roman road (SN:86) which connected Caerleon (Isca) and Carmarthen (Moridunum) follows the line of the A48 on a north-south alignment, approximately 550m east of the Site. This route runs through a relatively narrow coastal strip along the south Wales coast and would have been the primary access route to west Wales from England. The Cantasus Stone (SN:84) is a squared sandstone pillar found adjacent to the projected line of the Roman road at the junction of Tollgate Road and Morfa Road, approximately 890m north of the Site. It originally served as a Romano-British milepost before being repurposed into an Early Christian monument and has since been removed to the local museum. A coin of the emperors Galba (SN:85) has also been found on Margam Sands, approximately 945m east of the Site.

4.6 Medieval Period (AD 410 – 1540)

4.6.1 The focal sites for settlement activity in the area around the Site during the medieval period would have been Margam Abbey (SN:6), approximately 1.5km east of the Site, Kenfig approximately 3.5km south of the Site and Aberavon, approximately 4km north of the Site.

4.6.2 Margam is notable as a place of religious importance throughout the medieval period with the Cistercian Abbey (SN:6) having founded on the site of the modern parish church (St Marys Abbey Church SN:12) by Robert of Gloucester in 1167AD and later dissolved in 1536AD. The influence of the Abbey is seen throughout the surrounding landscape during the medieval period, including at Hen Biniwn (SN:87), also referred to as Middle Burrows Grange and New Grange, a medieval grange approximately 400m west of the Site which was historically connected to the mother house of Margam Abbey (SN:6) via a paved causeway. The route of this causeway may have followed the Heol y Deiliaid which previously extended through the southern part of the Substation Area of the Site, as shown on the 1862 (later first edition) OS map. The line of the road appears to be preserved by two parallel ditches and hedgerows, which would make them historically ‘important’ under the 1997 Hedgerow Regulations. A section of the road was also identified as an earthwork during investigations (SN:81) approximately 315m east of the Site, as previously discussed in section 4.3.7. A small section of upstanding masonry associated with the grange was observed as being preserved within the steel works site during the walkover for this assessment. Both Hen Biniwn and the Site are located within Margam Moors, an area of low-lying reclaimed salt marsh between Margam Mountain and the coastal dunes at Margam Burrows. The association of this area with Margam Abbey (SN:6) indicates that reclamation of land within the moors is likely to have started within the medieval period (Heneb, 2025). Extensive potentially medieval to post-medieval ridge and furrow are also recorded on Margam Moors approximately 750m southeast of the Site further demonstrating the use of this area for agricultural purposes in this period.

4.6.3 Further medieval sites with religious associations are recorded within the 1km and 3km Study Areas These include a 14th to 15th century bath house (SN:1) close to the Abbey which may

have been the baptistry for (the Grade II* listed) Hen Eglwys (SN:18), the (scheduled) Margam Inscribed and Sculptured stones collection (SN:7) located approximately 1.3km east of the Site and Ffynnon Pedr holy well (SN:88), located approximately 770m east of the Site.

4.7 Post-Medieval Period (AD 1540 – 1901)

4.7.1 As discussed in section 3.7.4, much of the historic mapping for Margam, including the Tithe map, is not publicly accessible and as such it is not possible to ascertain the date of the draining and enclosure of land within the parish. The Site is shown on the 1830 (first edition) OS map as part of the Margam Moors, across which several major drainage ditches traverse. These include the extant Upper Mother Ditch which defines the northern and eastern boundaries of the Site, and the Wal Ddu which crosses the northern part of the Site. The network of smaller, subsidiary drains and/or field boundaries that branch off these ditches across the Site are shown on later 19th century OS maps, however, it is unclear if they are not shown on the 1830 map due to not having been established by this time, or due to a lack of detail and may have been established earlier (see 4.6.2). Where these ditches and/or field boundaries are defined by hedgerows, and should they have been established prior to the enclosure acts, they have the potential to be considered 'important' under the 1997 Hedgerow Regulations.

4.7.2 A small number of isolated farmstead buildings are also first shown on the 1830 OS map within the Moor including the previously discussed Hen Binwin (SN:87) and Ty'n-y-Caeau farmstead (SN:98) approximately 500m east of the Site. Many other post-medieval farmsteads are recorded within the 1km Study Area, particularly to the north of the Site on the slopes of Margam Mountain (SN:90,91,93,99,100) and in the area now covered by the urban expansion of Port Talbot (SN:95,96,97).

4.7.3 Margam Castle (SN:17) is a Grade I listed, 19th century, Tudor-Gothic mansion designed by the architect Thomas Hopper for Christopher Rice Mansel Talbot located approximately 220m east of the Site, set within the Grade I listed Margam Park (SN:75) RPG. The location of the house and park was selected to reinforce the historic associations with earlier monuments, including a medieval deer park (SN:75), and for its elevated position overlooking the coastal plains, including the town of Port Talbot which is named after the estate owners. The HER data records the presence of Margam Castle's Middle Lodge (SN:105) approximately 220m west of the Site, although no corresponding building can be seen on the OS mapping. It is therefore likely to be the same building as the Grade II listed Middle Lodge (SN:32) located within Margam Park.

4.7.4 The post-medieval period represents a time of significant industrialisation and growth across the Study Area and surrounding landscape. Much of the focus of industrial activity was to the north of Port Talbot, which was formed by the amalgamation of the settlements of Aberavon and Taibach in 1837 (Port Talbot Historical Society, 2025), named after the Talbot family of Margam Castle. However, post-medieval industrial activity within the 1km Study Area includes the Morfa Colliery and Gas Works (SN:103,102), approximately 900m west of the Site. The Site is underlain by a number of inferred coal seams, likely worked as part of the Morfa Colliery, which operated between approximately 1849 and 1913. Further evidence for post-medieval extractive industry is represented by the Bromail colliery (SN:89), approximately 880m northeast of the Site and the gravel pit (SN:92) in Margam, approximately 900m east of the Site. The South Wales Railway, which opened between Chepstow and Swansea in 1850 (Welsh Railway Research Circle, 2025), passes through the Study Area, and runs immediately adjacent to the Site.

4.7.5 Evidence of post-medieval maritime activity is recorded in the Study Area as would be expected due to its coastal location and proximity to the busy industrial harbour at Port Talbot. The scheduled wreck site of the Tudor merchant ship, the Ann Francis (SN:11), is located approximately 1.8km west of the Site on Margam Sands. The ship, which was wrecked on the 28th December 1583 whilst returning from a trading voyage to Spain, is one of 17 such wrecks documented on Margam and Kenfig sands. A fragment of ship's timber (SN:152) was also recorded approximately 370m west of the Site.

4.7.6 The Grade II* listed Beulah Welsh Calvinistic Methodist Chapel (SN:22) was constructed in 1838 at its original location in the village of Groes (SN:117) approximately 415m east of the Site. The chapel was moved to its current location in Tollgate Park, approximately 560m north of the Site, during construction of the M4 motorway in 1974, along with its associated Grade II listed vestry (SN:67), gates, piers and railings (SN:68). A Grade II listed gothic style listed milepost (SN:69) was also moved from its original location to Tollgate Park approximately 180m north of the Site. The park takes its name from a tollhouse (SN:101) recorded on at this location in 1877 approximately 235m north of the Site.

4.8 Modern (1901 – Present)

4.8.1 Significant changes in land use have taken place within the landscape surrounding the Site during the modern period, evolving from a largely rural and ecclesiastical character in the preceding medieval and post-medieval periods to widespread industrial use, particularly associated with metalworking with which the modern town is still synonymous today. This represents the southward expansion of activity from the industrial core of Port Talbot to the north of the Study Area.

4.8.2 The most significant change within the immediate vicinity of the Site was the construction of the Abbey Steel Works (SN:116) which opened in 1951 approximately 65m east of the Site. The extent of the works can be clearly seen on aerial photos taken in 1948 and on the 1956 (1:25,000) OS map. The expansion of industrial activity associated with the Abbey Steel Works also necessitated upgrades in the railway network with the 1956 OS map showing the addition of a railway holt for the works to the east of Harbour Road immediately adjacent to the access road within the northern part of the Site. Increased industrial activity in the area is further represented by the British Oxygen Company (BOC) Works (SN:115) approximately 250m south of the Site.

4.8.3 The existing substation within the Site was constructed sometime between 1964 and 1970, and is first shown on the 1970 (1:2500) OS map connected to overhead power lines which head east and south from the substation. The remainder of the Site is shown on the 1970 map to have remained a mix of marsh and drained agricultural land. Temporary trackways and compounds are seen across the Site and the wider Study Area on 21st-century aerial imagery, and associated remains/disturbances are also evident on LiDAR (Figure 5) and geophysical survey data (SN:121, Headland Archaeology 2022). These appear to relate to ancillary features and works associated with the substation and steel works.

4.8.4 The importance of Port Talbot as a key industrial town made it a target for bombing raids in both the First and Second World Wars, as evidenced by the number of military assets within the Study Area. Chain Home Low Radar Station (SN:2) is a scheduled Second World War radar station located approximately 830m east of the Site on the hillside above Margam whose principle defensive purpose was to detect enemy shipping and low flying aircraft within the Bristol Channel. Three concrete buildings and a platform remain extant on the site, one of which includes a gantry which is thought to be unique within the British Isles. A Second World War small arms range (SN:112) is recorded adjacent to the Lower Mother ditch approximately 970m west of the Site. The Pillbox Study Group note that this has since been removed. In addition to the aforementioned defensive assets, there is also a military air crash site within the Study Area (SN:111). The exact location of this is confidential however, it was not within the Site.

4.8.5 A Gorsedd Circle (SN:107) is also recorded within Margam Park, approximately 825m east of the Site. The circle is one of many that exist within Wales and was erected in 2002 in celebration of the Urdd Eisteddfod which was held in Margam Park in 2003. It is formed of 11 stones in a circular layout with a central inlier.

4.9 Undated

4.9.1 There is one undated record in the Study Area. This is the settlement of Groes (SN:117) which was located approximately 770m east of the Site but has since been destroyed by the construction of the M4 motorway.

4.10 Previous Impacts and Archaeological Survival

4.10.1 Areas of existing development within the Site comprise the existing Margam substation and pylons associated with the overhead power lines. The archaeological resource is expected to have been destroyed within the intrusive footprint of this existing infrastructure. It is also apparent from aerial imagery and LiDAR (Figure 5) that a number of 'temporary' trackways and compounds have been previously established within the Site. Groundworks associated with the establishment of these will have damaged or destroyed any above ground and/or shallow sub-surface archaeological remains present within their footprint, although any deeper archaeological and/or palaeoenvironmental features and deposits may survive.

4.10.2 Beyond the aforementioned areas of development, a large proportion of the Site comprises historically undeveloped reclaimed wetland, across which it is expected the archaeological and palaeoenvironmental resource will remain largely intact. Whilst excavation of the drainage ditches will have removed earlier deposits within their footprint/s, they are also themselves of historic value and well-preserved archaeological and/or palaeoenvironmental remains could survive within buried silts at the base.

4.10.3 Tidal Flat deposits underlie the Site, and peat deposits have been recorded by geotechnical ground investigations (Jacobs, 2008; Geotechnics Limited, 2025) to be present within the alluvial sequence. Archaeological and/or palaeoenvironmental deposits may survive both within and underlying these superficial deposits, and due to the anaerobic conditions, organic remains (wood, leather, animal and plant fibres etc.) may also be preserved. Ground investigations have demonstrated the Tidal Flat deposits are of some depth (up to 4.9m BGL), and therefore it is also possible that archaeological and palaeoenvironmentally relevant deposits may survive below the intrusive footprints of the infrastructure, features and/or practices discussed above.

4.11 Susceptible Historic assets

4.11.1 Historic assets that have been identified within the baseline as having the potential to receive direct physical effects and/or indirect effects to setting from the Scheme, are included in Table 1. The significance of these is discussed in Section 5 and the potential impact of the Scheme upon them is considered in Section 6.

Table 1: Historic assets susceptible to potential effects from the Scheme

Asset Name	Asset Type	Stantec No.	NGR	Potential Impacts
Archaeology				
Heol y Deiliaid	Non-designated historic asset	n/a	SS 78739 86090	Direct physical impact
Earthworks including drainage ditches	Non-designated historic assets	n/a	n/a	Direct physical impact
Unknown archaeological remains	Non-designated historic assets	n/a	n/a	Direct physical impact
Historic Landscape				
Upper Mother Ditch, Wal Ddu and associated drainage network	Non-designated historic assets	n/a	n/a	Direct physical impact
Historic hedgerows	Historically important hedgerows	n/a	n/a	Direct physical impact

5 Statement of Significance

5.1 Introduction

5.1.1 In accordance with Cadw's Conservation Principles (2011) and Stage 2 of Setting of Historic Assets in Wales (2017) the following section assesses the heritage significance of the known historic assets as identified in the archaeological and historic baseline that have the potential to receive effects from the Scheme, and whether, and to what degree, the Site contributes towards the setting and heritage significance of these assets. The archaeological potential and significance of archaeological remains within the Site is also summarised based on the historic environment baseline and known previous impacts.

5.2 Designated Historic Assets

5.2.1 No designated historic assets were identified by Stage 1 assessment as having the potential to receive effects from the Scheme.

5.3 Non-Designated Historic Assets

Archaeology (Known and Potential)

5.3.1 Evidence for prehistoric activity within the Study Area in the form of Bronze Age barrows, cairns and Iron Age hill forts, are concentrated on the slopes of Margam Mountain to the east. Features such as this are unlikely to be found in the lower lying land where the Site is located, with any prehistoric remains most likely to comprise residual finds indicative of exploitation of coastal resources. Peat deposits which have a raised potential for preservation of palaeoenvironmental remains of prehistoric date are also recorded within the Site.

5.3.2 A Roman road (SN:86) passes through the Study Area, approximately 550m east of the Site however, the lower lying land where the Site is located is likely to have been unsuitable for occupation during the Romano-British period. Accordingly, there is a limited potential for evidence of settlement activity dating to this period to be present within the Site, with any remains most likely to comprise residual finds indicative of the continued exploitation of coastal resources.

5.3.3 The Site is located away from the focus of medieval settlement activity, which was dominated by the religious centre of Margam to the east, with the closest known medieval settlement to the Site comprising Hen Biniwn grange (SN:87) approximately 400m to the west. The line of the Heol y Deiliaid which is purported to follow the route of a medieval paved causeway connecting Hen Biniwn grange to Margam Abbey (SN:6) runs along the southern boundary of the Site. The line of the road appears to be preserved by two parallel ditches and hedgerows, and it is possible that further below ground remains could also be present. Drainage ditches within the Site (as discussed in paragraph 5.3.4) may also be of potential medieval origin. These landscape features are of heritage interest in relation to the development and historic use of the landscape, although are not likely to be of sufficient value to be considered nationally significant (equivalent to a scheduled monument).

5.3.4 Several extant drainage ditches of at least 19th century date, although possibly of earlier post-medieval or medieval origin, extend through and/or define the boundary of the Site. These include the Upper Mother Ditch and Wal Ddu. Although of heritage interest in relation to the development of the agricultural landscape these are not likely to be of sufficient value to be considered nationally significant (equivalent to a scheduled monument). There is also a potential for further, as yet unknown post-medieval agricultural remains, although these are likely to be of limited historic value.

5.3.5 Areas of existing development within the Site comprise the existing Margam substation and associated infrastructure, which are considered to be of historic value. Any further remains associated with phases of modern development are also of limited historic value.

5.3.6 Tidal flat deposits containing peat horizons are recorded within the Site to a depth of 4.9m BGL. These deposit sequences are of potential palaeoenvironmental interest and can be used to reconstruct past environments and further understand the depositional history of dynamic coastal environments, particularly those which have been subjected to historic land management strategies such as land drainage and reclamation. The anaerobic conditions within peat and alluvium also provide favourable conditions for the preservation of organic archaeological remains such as those made of wood, leather and animal and plant fibres.

Historic Landscape

5.3.7 A Historic Landscape Characterisation program in Wales by Cadw and the Countryside Council for Wales is currently on-going, and the area within which the Site is located has not yet been characterised.

5.3.8 The southwestern part of the Study Area forms part of the Merthyr Mawr, Kenfig and Margam Historic Landscape which is subdivided into smaller character areas. These include the Margam Moors, which is characterised as low-lying enclosed wetland pasture set on reclaimed salt marsh. Margam Moors historically formed part of the land holdings of Margam Abbey (SN:6), with the monastic grange Hen Binwin (SN:87) being located in close proximity. The characteristic features of the Moor comprise its varied, field pattern of potential medieval origin, ridge and furrow earthworks and drainage ditches including the Lower Mother and Middle Mother Ditches. Although beyond the Margam Moors, the undeveloped part of the Site is similar in form and character, with the Upper Mother Ditch defining its northern and eastern boundaries. The Margam Moors landscape holds information on historic land reclamation and agricultural practices however it is not considered to be of equivalent significance to a Registered Historic Landscape.

5.3.9 Hedgerows defining the route of the former Heol y Deiliaid along the southern boundary of the Site, are considered to be historically ‘important’ under the 1997 Hedgerow Regulations due to the likely medieval origin of the road and its association with the Margam estate. Hedgerows alongside the Upper Mother Ditch and the Wal Ddu, and defining any smaller subsidiary ditches and/or field boundaries, should also be considered ‘important’, due to their potential to pre-date the enclosure acts.

5.3.10 Developed parts of the Site comprising the existing 20th century Margam substation and pylons are industrial in character. Prior to the development of this infrastructure the land would have been reclaimed salt marsh used for agricultural purposes, consistent with the Margam Moors landscape characterisation, however the legibility of this character within the footprint of the substation has been eroded by its construction. Landscapes of industrial character are common around Port Talbot and as such are not considered to be of equivalent significance to a Registered Historic Landscape.

6 Statement of Effect

6.1 Introduction

6.1.1 In accordance with Stage 3 of Setting of Historic Assets in Wales (2017) the following section evaluates the potential impact of the Scheme upon the significance of sensitive historic assets, including direct physical impacts and indirect impacts as a result of changes to setting. In accordance with Stage 4, this section also considers opportunities to mitigate any potential impacts on that significance arising from the Scheme.

6.2 Proposed Scheme

6.2.1 The proposed Scheme covers the extension of the Margam 275kV substation including the erection of a gas insulated switchgear hall (GIS hall) and the demolition of the existing control and amenities buildings to enable the erection of a new amenities building. Works to include earthworks, surface water management and drainage infrastructure, lighting, CCTV, boundary treatment, car parking, ecological improvements including a wildlife tower and gabion baskets, improved internal access roads, diesel generator and hardstanding storage building and water storage tank, flood defence wall including flood gates and appropriate landscaping and other associated engineering operations. The extension will be located immediately to the east of the existing Margam Substation.

6.2.2 The majority of the proposed new infrastructure will be constructed on a raised platform set on piled foundations at a level of 4.15m above Ordnance Datum (aOD) to tie into the existing substation and will have a maximum height of 12.91m. The Gross External Area (GEA) for the GIS Hall is 1,862.84 m^2 and the ridge height will be 17.06 m. The primary materials are steel and brick. The existing amenity building will be demolished to enable the erection of the new amenities building upon the existing platform. The ridge level of the new amenities building is 8.077m.

6.2.3 A flood defence wall (1150mm high and 1000m deep) is proposed to protect the existing and proposed substations set at a level of 5m aOD. As a worst case, the flood wall will consist of a sheet piled wall offset 2m outside of the new and existing Margam perimeter fence line. A detention basin is also proposed to the north of the substation, to the south of the Upper Mother Ditch.

6.2.4 A new permanent access road is proposed to connect the existing access track with the substation extension.

6.3 Scale and Significance of Impact

Designated Historic Assets

6.3.1 The Scheme will not result in direct impacts upon any designated historic assets or any indirect changes to setting that will impact upon their heritage interests and significance.

Non-Designated Historic Assets

Archaeology (Known and Potential)

6.3.2 The Site has a demonstrable potential to contain archaeological remains. Any intrusive works have the potential to have an adverse impact (damage or remove) upon these and any as yet unknown archaeological remains and/or palaeoenvironmental deposits which may be present within their footprint. These include, but are not limited to:

- Piling for the platform upon which the majority of the new substation infrastructure will be situated;

- Construction of the amenities and Distribution Network Operator (DNO) building;
- Construction of flood defence wall;
- Excavation of the attenuation basin;
- Excavation of post-holes for the installation of perimeter fencing;
- Open cut trenching for services;
- Stripping for the construction of the access roads.

6.3.3 Any impacts upon the archaeological resource will be permanent and irreversible.

6.3.4 The Site also contains earthworks of post-medieval, and possible medieval, date which include drainage ditches and field boundaries. The Heol y Deiliaid and Upper Mother Ditch are located outside the intrusive footprint of proposed works and will not be impacted by the Scheme, although works for the access track extend up to the edge of the Wal Ddu and have the potential to impact upon deposits associated with this feature. Some minor drainage ditches/former boundaries will also be partially impacted. Based on existing understanding these remains would not be of such significance as to preclude or otherwise constrain the Scheme, as impacts will be small and localised and their loss could be mitigated through proportionate archaeological works (preservation by record).

6.3.5 Geotechnical investigations have demonstrated the presence of peat deposits within the Site. Deposit modelling of the peats has not been undertaken and as such it is not possible to fully assess their spatial distribution, however they are expected to be widespread. Localised loss of peat deposits will occur within the intrusive footprint of the Scheme.

Historic Landscape

6.3.6 The Scheme will result in the loss of the historic reclaimed agricultural land within the footprint of the proposed substation extension. However, this impact will be confined to a small area adjacent to the existing industrial landscape, with which it will be seen in conjunction, and will not detract from the legibility of the wider historic landscape.

6.3.7 Potentially historically ‘important’ hedgerows along the line of Wal Ddu and other minor drainage ditches/former boundaries will also be partially removed within the footprint of the substation infrastructure and where crossed by the flood defences and perimeter fencing. However, this impact will be confined to comparatively small parts of both the features and the wider landscape, and following appropriate ground reinstatement there will be a limited residual impact upon the historic landscape character.

7 Consultation and Further Works

7.1.1 This section outlines the consultation which has been undertaken to help establish suitable heritage-led design measures and the measures which have been implemented in order to enhance or better reveal susceptible historic assets through the Scheme, and how harmful impacts have been avoided or minimised.

7.1.2 The requirement for a HEDBA was established during initial consultation with Rob Dunning, Stewardship Officer at Heneb, and a HEDBA WSI (Stantec, 2025) detailing the scope and methodology was approved on 14/07/2025. A copy of the WSI was also provided to and acknowledged by Cadw (Neil Maylan 14/07/2025).

7.1.3 Further consultation was undertaken with Heneb (Rob Dunning 22/07/2025; 23/07/2025) to discuss the results of this assessment and to understand the requirement, scope and timing of any further archaeological works. During this consultation it was agreed that any requisite mitigation measures can be carried out post-determination, with no requirement for pre-determination evaluation. It was proposed that this mitigation will comprise either an archaeological monitoring and recording action maintained during intrusive works and/or a strip, map, sample excavation, as appropriate. Further consultation will need to be carried out to determine the detailed scope. Any works required will need to be carried out in accordance with a WSI submitted and approved by Heneb prior to works starting.

7.1.4 Hedgerows to be impacted by the Scheme along the line of Wal Ddu and other minor drainage ditches/former boundaries should be considered historically ‘important’ under the Hedgerow Regulations 1997. National Grid have determined that this work is in line with their permitted development rights as a statutory undertaker in relation to hedgerow removal as a consequence of any notice given or order made under paragraph 9 of Schedule 4 of the Electricity Act (1989). However, Heneb confirmed during consultation (Rob Dunning, 23/07/2025) that they will require an archaeological monitoring and recording action to be maintained during any works affecting these hedgerows.

8 Conclusion

8.1.1 This assessment has included a review of a comprehensive range of available sources, in accordance with key industry guidance, to identify the known and potential heritage assets within the Site and its environs which may be affected by the Scheme. It has not identified any historic environment constraints that will significantly constrain or preclude the Scheme.

8.1.2 The Scheme will not result in direct impacts upon any designated historic assets or any direct changes to setting that will impact upon their heritage interests and significance.

8.1.3 Modern industrial works have resulted in localised disturbance within the footprint of the existing substation however, the majority of the Site is composed of undeveloped agricultural land which has demonstratable potential to contain archaeological remains. Extant landscape features of post-medieval and/or possible medieval date have been identified within the Site. These include former drainage ditches known as the Upper Mother Ditch and Wal Ddu, and the line of the Heol y Deiliaid which extends along the southern boundary of the Site. This former road is believed to follow the route of a medieval paved causeway connecting Hen Biniwn Grange (SN:87), which formerly stood to the west of the Site, to Margam Abbey (SN: 6) to the east. The line of the road appears to be preserved by two parallel ditches, and it is possible that further below ground remains may survive. Based on existing understanding, none of the known archaeological remains are of sufficient value to be considered nationally significant (equivalent to a scheduled monument). However, there is a potential for further as yet unknown archaeological remains to be present.

8.1.4 Tidal flat deposits containing peat horizons are recorded across the Site. These deposit sequences are of potential palaeoenvironmental interest and can be used to reconstruct past environments and further understand the depositional history of dynamic coastal environments, particularly those which have been subjected to land management strategies such as land drainage and reclamation. The anaerobic conditions within peat and alluvium also provide favourable conditions for the preservation of organic archaeological remains such as those made of wood, leather and animal and plant fibres.

8.1.5 Any intrusive works have the potential to have an impact (damage or remove) upon known and as yet unknown archaeological remains and/or palaeoenvironmental deposits within their footprint. This includes, but is not limited to, piling of foundations for the GIS hall and flood defences, groundworks for construction of the amenity building and DNO, stripping for the creation of permanent access road, and excavation of the attenuation basin. The Heol y Deiliaid and Upper Mother Ditch are located outside the intrusive footprint of proposed works and will not be impacted by the Scheme, although works for the access track extend up to the edge of the Wal Ddu and have the potential to impact upon deposits associated with this feature. Some minor drainage ditches/former boundaries will also be partially impacted.

8.1.6 Further consultation was undertaken with Heneb to discuss the results of this assessment and to understand the requirement, scope and timing of any further archaeological works. During this consultation it was agreed that any requisite mitigation measures can be carried out post-determination, with no requirement for pre-determination evaluation. It was proposed that this mitigation will comprise either an archaeological monitoring and recording action maintained during intrusive works and/or a strip, map, sample excavation, as appropriate. Further consultation will need to be carried out to determine the detailed scope. Due to the presence of peats across the site, purposive geoarchaeological borehole sampling may also be requested. Any works required will need to be carried out in accordance with a WSI submitted and approved by Heneb prior to works starting.

8.1.7 The Scheme will result in the loss of the historic reclaimed agricultural land within the footprint of the proposed substation extension. However, this impact will be confined to a small area adjacent to the existing industrial landscape and will therefore not detract from the legibility of the wider historic landscape. Hedgerows to be impacted by the Scheme should be considered historically ‘important’ under the Hedgerow Regulations 1997. National Grid have determined that this work is in line with their permitted development rights as a statutory undertaker in

relation to hedgerow removal as a consequence of any notice given or order made under paragraph 9 of Schedule 4 of the Electricity Act (1989). However, Heneb confirmed during consultation (Rob Dunning, 23/07/2025) that they will require an archaeological monitoring and recording action to be maintained during any works affecting these hedgerows.

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Appendix A Heritage Planning Policy

A.1 Legislation

A.1.1 The Historic Environment (Wales) Act 2023 has been enacted to provide new legislation for the protection and management of historic monuments and buildings, conservation areas and other elements of the Welsh historic environment. Scheduled monuments and Listed Buildings within Wales were previously subject to the provisions of The Ancient Monuments and Archaeological Areas Act (1979) and the Planning (Listed Buildings and Conservation Areas) Act 1990, both of which are now superseded in Wales by the Historic Environment (Wales) Act 2023.

A.1.2 Listed buildings are buildings of 'special architectural or historic interest' and are subject to the provisions of the Historic Environment (Wales) Act 2023. Under Section 88 of the Act '*A person must not carry out works to which this section applies, or cause such works to be carried out, unless the works are authorised under section* 89'. This applies to '*works for the alteration or extension of a listed building in any way that would affect its character as a building of special architectural interest*' and '*works for the demolition of a listed building*'. . Authorisation is granted via Listed Building Consent under section 89 of the Act. Under Section 96 of the Act '*in considering whether to grant listed building consent, the planning authority of the Welsh Ministers must have special regard to the desirability of preserving the listed building to which the application relates, the setting of the building, and any features of special architectural or historic interest the building possesses'.*

A.1.3 Scheduled monuments are also subject to the provisions of the Historic Environment (Wales) Act 2023. The Act sets out the controls of works affecting Scheduled monuments and other related matters. It does not include provision for the setting of scheduled monuments.

A.1.4 Hedgerows are offered some protection under The Hedgerow Regulations 1997. This legislation is applicable to hedgerows of more than 20m in length or which join other hedgerows provided they adjoin agricultural land, forestry, paddocks, common land, village greens, a site of special scientific interest or a local nature reserve.

A.1.5 To remove any such hedgerow, the owner must serve notice to the local planning authority, who decide whether it is 'important' and whether it needs to be retained. A hedgerow is defined as 'important' in heritage terms where it has existed for 30 years or more and meets on of the following criteria from the Regulations:

- It makes a boundary between parishes which existed pre 1850;
- It marks an archaeological feature of a scheduled ancient monument or noted on the historic environment record;
- It marks the boundary of a pre-1600 estate or manor or a field system pre-dating the Enclosure Acts.

A.2 National Planning Policy Framework

A.2.1 National Planning Policy is provided in Planning Policy Wales Edition 12 (2024). This provides the national planning policy framework for the historic environment, supplemented by guidance contained in Technical Advice Note 24: The Historic Environment.

A.2.2 Future Wales: The National Plan 2040 (Llywodraeth Cymru, 2021) is Wales' national development framework, setting the direction for development in Wales to 2040. It has development plan status and provides a strategy for addressing key national priorities through the planning system. The document provides more general commentary with regards to heritage, noting that, in the south-west region, it is important that the 'distinctive heritage is preserved and enhanced by high-quality development'. More detailed national heritage policy

is contained within Planning Policy Wales Edition 12 (2024). This provides the national planning policy framework for the historic environment, supplemented by guidance contained in Technical Advice Note 24: The Historic Environment.

A.2.3 Planning Policy Wales Edition 12 (PPW, 2024) states *'where nationally important archaeological remains and their settings are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. Where a proposal will impact less significant archaeological remains, planning authorities are required to weigh the relative importance of the archaeological remains and their setting against the need for the development'* (pp. 132-133).

A.2.4 With regards to proposed development sites with archaeological potential, paragraph 6.1.26 states *'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'.*

A.2.5 In relation to archaeological mitigation, paragraph 6.1.27 states *'If the planning authority is minded to approve an application and where archaeological remains are affected by proposals that alter or destroy them, the planning authority must be satisfied that the developer has secured appropriate and satisfactory provision for their recording and investigation, followed by the analysis and publication of the results and the deposition of the resulting archive in an approved repository. On occasions, unforeseen archaeological remains may still be discovered during the course of a development. A written scheme of investigation should consider how to react to such circumstances or it can be covered through an appropriate condition for a watching brief. Where remains discovered are deemed to be of national importance, the Welsh Ministers have the power to schedule the site and in such circumstances scheduled monument consent must be required before works can continue'.*

A.2.6 The Welsh Governments Technical Advice Note (TAN) 24: The Historic Environment (2017) provides much more detailed guidance on the protection of the historic environment in planning. It describes archaeological remains as '*a finite and non-renewable resource'.* Those paragraphs relevant to the Proposed Development are reproduced below.

4.2 The conservation of archaeological remains is a material consideration in determining a planning application. 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 (see Annex A). In cases involving less significant archaeological remains, local planning authorities will need to weigh the relative importance of the archaeological remains and their settings against other factors, including the need for the proposed development.

4.3 Where development might reveal, disturb or destroy archaeological remains, including palaeo environmental evidence, it is important that the opportunities to record archaeological evidence are taken and that archaeological remains are not needlessly destroyed. The ability to record such evidence should not be a factor in deciding whether controlled removal should be permitted.

4.7 Where archaeological remains are known to exist, or considered likely to exist, and a study has not already been undertaken by the applicant, the local planning authority should ask an applicant to undertake a desk-based archaeological assessment and, where appropriate, an archaeological evaluation. These should be done by a qualified and competent expert to the appropriate standard. The reports of these investigations will form part of the planning application. Applicants should show they have modified their development proposals to minimise any negative impact on the identified archaeological remains, and how they intend to mitigate any remaining negative impacts.

4.9 When considering planning applications that affect known or potential archaeological remains, the local planning authority should consult with their archaeological advisor about the impact, including the potential scale and harm, of the development on archaeological remains, and/or the adequacy of the mitigation of what has been proposed. These two factors are material considerations in determining the planning application. Where a planning application directly affects a scheduled monument and its setting then the local planning authority is required to consult the Welsh Ministers through Cadw'.

4.10 The case for the preservation of archaeological remains that are not considered to meet the criteria for national importance (see Annex A.2), must be assessed on the individual merits of each case. The local planning authority must take into account relevant policies and material considerations, and will need to weigh the significance of the remains against the benefits of and need for the proposed development. In cases where there are issues of more than local importance, applications may be called in for determination by the Welsh Ministers.

4.11 Measures can be taken to minimise the impact of a development proposal on identified archaeological remains and allow their preservation in situ. For example, those aspects of a proposal that might cause damage, such as drains and other services, may be relocated. Similarly, foundations may be redesigned so as not to penetrate archaeological layers, or augered piling may prove more acceptable than large-scale deep excavation. In considering these solutions, a local planning authority must consider both direct and indirect impacts, such as changes to the hydrology and soil chemistry of a site, and be confident that the development can be removed at a future date without additional impacts upon the buried remains. In some cases, it may be possible to enable the partial preservation of archaeological remains. However, leaving 'islands' of preserved archaeology is not desirable. Careful design can also minimise the effect upon setting, through detailed siting of the development, considering external appearances, the use of screening or by mitigating the visual impact of the proposals by removal of existing unsightly elements. Recording and Furthering Understanding of Archaeological Evidence

4.12 Having considered all policies and other material considerations and the need for the development, the local planning authority may decide that the significance of the archaeological remains is not sufficient to justify their physical preservation. In these cases, the local planning authority must satisfy itself that the necessary and proportionate arrangements for the excavation and recording of these archaeological remains are secured, and the results of this archaeological work are properly analysed and published and that arrangements are made for the deposition of the resulting archive to the appropriate standards. This can be achieved by the local planning authority issuing a brief setting out the scope of the archaeological work that is required, which should be prepared in consultation with their archaeological advisor.

A.3 Local Planning Policy

A.3.1 The Site is situated within Neath Port Talbot County Borough Council (CBC). The Neath Port Talbot CBC Local Development Plan 2011-2026, which was adopted on 27th January 2016, provides the basis for decisions on land use planning in the borough up to 2026. The LDP sets out the spatial vision for the future of Neath Port Talbot CBC and a framework for the distribution and delivery of growth and development. The adopted policies relevant to heritage and the Scheme are reproduced below.

Strategic Policy SP21: Built Environment and Historic Heritage

A.3.2 'The built environment and historic heritage will, where appropriate, be conserved and enhanced through the following measures:

1. Encouraging high quality design standards in all development proposals;

2. Protecting arterial gateways from intrusive and inappropriate development;

3. Safeguarding features of historic and cultural enhancement: importance;

4. The identification of the following designated sites to enable their protection and where appropriate enchancement:

(a) Landscapes of Historic Interest;

(b) Historic Parks and Gardens;

(c) Conservation Areas;

(d) Scheduled Ancient Monuments; and

(e) Listed Buildings and their curtilage.'

Policy BE1: Design

A.3.3 *'All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.*

Proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

1. *It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;*

2. *It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;*

3. *It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;*

4. *It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;*

5. *Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;*

6. *It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement);*

7. *It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;*

8. *It uses resources, including land and energy, as efficiently as possible through:*

   (a) *Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area;*

   (b) *The layout and form of the development does not preclude the reasonable use of other adjacent land;*

(c) Developing brownfield land in preference to greenfield land where possible;

(d) Minimising building exposure while maximising solar gain.

9. *Its drainage systems are designed to limit surface water run-off and flood risk and prevent pollution;*

10. *The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities.'*

Appendix B Gazetteer of Heritage Records

Designated Historic assets

Stantec Reference	CADW Reference	Heneb Reference	RCHAMW Reference	Name	Type	Grade	Easting	Northing
1	828	n/a	n/a	Margam Medieval Bath House	Scheduled Monument	n/a	280306	186925
2	1421	GGAT02995w	308125	Chain Home Low Radar Station, Margam	Scheduled Monument	n/a	279332	187081
3	2250	n/a	n/a	Ergyd Uchaf Round Barrow	Scheduled Monument	n/a	280614	188872
4	2256	n/a	n/a	Ty'n-y-Cellar Standing Stone	Scheduled Monument	n/a	280242	183740
5	2298	n/a	n/a	Half Moon Camp	Scheduled Monument	n/a	279965	186732
6	2854	n/a	n/a	Margam Abbey	Scheduled Monument	n/a	280185	186252
7	2861	n/a	n/a	Margam Inscribed & Sculptured Stones	Scheduled Monument	n/a	280139	186350
8	2868	n/a	n/a	Ergyd Isaf Round Barrows	Scheduled Monument	n/a	279443	188656
9	2869	n/a	n/a	Mynydd y Castell Camp	Scheduled Monument	n/a	280616	186572
10	2870	n/a	n/a	Hen Eglwys Chapel and Defended Enclosure	Scheduled Monument	n/a	280123	186522
11	4453	n/a	n/a	Wrecking site of the Ann Francis	Scheduled Monument	n/a	276389	185948
12	14148	n/a	n/a	St Mary's Abbey Church	Listed Building	I	280152	186291
13	14149	n/a	n/a	Ruins of Chapter House and Vestibule of St Mary's Abbey	Listed Building	I	280197	186267
14	14150	n/a	n/a	Ruined Undercroft at St Mary's Abbey	Listed Building	I	280193	186235
15	14152	n/a	n/a	Margam Orangery	Listed Building	I	280118	186238

16	14153	n/a	n/a	Ivy Cottage including Facade of Former Banqueting House	Listed Building	I	280081	186287
17	14170	n/a	n/a	Margam Castle	Listed Building	I	280494	186284
18	14155	n/a	n/a	Hen Eglwys	Listed Building	II*	280123	186522
19	14158	n/a	n/a	Old Park	Listed Building	II*	280698	185027
20	14160	n/a	n/a	Church of St Theodore	Listed Building	II*	277255	189098
21	14163	n/a	n/a	Terrace Walls and Screen at Margam Castle	Listed Building	II*	280447	186250
22	14172	GGAT08609w	9858	Beulah Calvinistic Methodist Chapel	Listed Building	II*	278373	187422
23	23256	n/a	n/a	War Memorial	Listed Building	II*	277319	189063
24	23267	n/a	n/a	Terrace with Pools and Flower Beds Fronting Margam Orangery	Listed Building	II*	280118	186217
25	23274	n/a	n/a	Monastic Baths	Listed Building	II*	280304	186925
26	23278	n/a	n/a	Service Buildings including Courtyard Walls at Margam Castle	Listed Building	II*	280552	186290
27	87732	GGAT08373w	n/a	Margam Crematorium	Listed Building	II*	279537	185580
28	14151	n/a	n/a	Almshouses	Listed Building	II	280071	186318
29	14157	n/a	n/a	Barn at Eglwys Nunydd	Listed Building	II	280304	184901
30	14161	n/a	n/a	Churchyard Walls and Gate Piers to St Mary's Abbey Church	Listed Building	II	280110	186307
31	14162	n/a	n/a	Kitchen Garden Walls including Vinery Glasshouse	Listed Building	II	280031	186342
32	14164	n/a	n/a	Middle Lodge	Listed Building	II	280015	186374
33	14165	n/a	n/a	Cwm Cottage	Listed Building	II	279852	186116
34	14166	n/a	n/a	Margam Cottage	Listed Building	II	279888	186115
35	14167	n/a	n/a	2 Grove Cottages	Listed Building	II	279846	186300
36	14168	n/a	n/a	Piers and Gates at East Lodge and Flanking Walls	Listed Building	II	281463	185145

37	14169	n/a	n/a	Gateway and Quadrant Walls Leading to Twyn yr Hydd	Listed Building	II	281044	185098
38	22136	n/a	n/a	Plaza Cinema	Listed Building	II	276856	189606
39	22806	n/a	n/a	Gibeon Chapel	Listed Building	II	277565	188921
40	22807	n/a	n/a	Carnegie Free Library	Listed Building	II	277352	188964
41	22808	n/a	n/a	Milepost	Listed Building	II	277650	188564
42	23152	n/a	n/a	Harbour Court	Listed Building	II	276687	189509
43	23154	n/a	n/a	Former Harbour House	Listed Building	II	276066	189031
44	23248	n/a	n/a	Holy Cross Church	Listed Building	II	277548	189515
45	23253	n/a	n/a	Dyffryn Chapel	Listed Building	II	277232	188964
46	23255	n/a	n/a	Gateway to Talbot Memorial Park	Listed Building	II	277279	189025
47	23257	n/a	n/a	Fountain in Honour of John Hopkin Davies	Listed Building	II	277358	189063
48	23258	n/a	n/a	Bandstand	Listed Building	II	277371	189116
49	23259	n/a	n/a	Lodge 2, Talbot Memorial Park	Listed Building	II	277290	189023
50	23260	n/a	n/a	Lodge 1, Talbot Memorial Park	Listed Building	II	277279	189035
51	23263	n/a	n/a	Twyn yr Hydd	Listed Building	II	281090	185277
52	23264	n/a	n/a	Citrus House	Listed Building	II	279984	186276
53	23265	n/a	n/a	Retaining Wall adjoining Citrus House	Listed Building	II	280014	186294
54	23266	n/a	n/a	Stone Steps in Terraced Garden	Listed Building	II	280422	186275
55	23268	n/a	n/a	Turbine House	Listed Building	II	280266	186048
56	23269	n/a	n/a	Stones Museum	Listed Building	II	280139	186349
57	23270	n/a	n/a	War Memorial	Listed Building	II	280102	186291
58	23271	n/a	n/a	Pair of Gate Piers to the Former Margam House	Listed Building	II	280066	186041
59	23272	n/a	n/a	Ornamental Pool	Listed Building	II	279992	186223
60	23273	n/a	n/a	Former Changing Room	Listed Building	II	279974	186251
61	23275	n/a	n/a	Broadwalk Steps	Listed Building	II	280272	186260

62	23276	n/a	n/a	Arch over Culvert	Listed Building	II	280260	186320
63	23277	n/a	n/a	Farm Building at Twyn yr Hydd	Listed Building	II	281148	185316
64	23279	n/a	n/a	Kitchen Garden Wall and Glass House at Twyn yr Hydd	Listed Building	II	281128	185322
65	23280	n/a	n/a	Garden Wall at Twyn yr Hydd	Listed Building	II	281096	185258
66	23281	n/a	n/a	Entrance to Twyn yr Hydd and Flanking Walls	Listed Building	II	281160	185190
67	23282	n/a	n/a	Vestry at Beulah Chapel	Listed Building	II	278370	187431
68	23283	n/a	n/a	Gates, Piers and Railings at Beulah Chapel	Listed Building	II	278362	187421
69	23284	n/a	n/a	Milepost at Tollgate Park	Listed Building	II	278407	187268
70	23285	n/a	n/a	Milepost near Margam Park Entrance	Listed Building	II	279911	185862
71	23286	n/a	n/a	Milepost near Old Park	Listed Building	II	280770	185287
72	23293	n/a	n/a	3 Grove Cottages	Listed Building	II	279839	186302
73	N/A	n/a	n/a	Margam Park	Conservation Area	n/a	280145	186282
74	PGW(Gm)45(NEP)	n/a	n/a	Talbot Memorial Park, Port Talbot	Registered Park and Garden	II	277327	189137
75	PGW(Gm)52(NEP)	00948.0w (GM52)	n/a	Margam Park	Registered Park and Garden	I	281010	186167
76	HLW (MGI) 1	n/a	n/a	Merthyr Mawr, Kenfig & Margam Burrows	Historic Landscape	n/a	282434	179684
77	HLW (WGI/MGI) 2	n/a	n/a	Margam Mountain	Historic Landscape	n/a	281485	188589

Previous Archaeological Investigations

Stantec Reference	CADW Reference	Heneb Reference	RCHAMW Reference	Name	Type	Grade	Easting	Northing
78	n/a	GGATE003777	n/a	Nantgarw-Margam pipleline (VHP 14)	Archaeological Monitoring	n/a	278631	186934
79	n/a	GGATE003784	n/a	VHP 14 Phase II, Nantgarw-Margam	Archaeological Monitoring	n/a	278631	186934

80	n/a	GGATE003786	n/a	Archaeological watching brief Nantgarw-Margam pipline (VHP 14) Phase I	Archaeological Monitoring	n/a	278631	186934
81	n/a	GGATE005024	n/a	Land at Margam West Glamorgan	Evaluation	n/a	279100	186200
82	n/a	GGATE006021	n/a	Dyffryn School, Margam, Glamorgan	Archaeological Monitoring	n/a	278618	187482
119	n/a	GGATE003918	n/a	Port Talbot Duplicate Main Phase I	Archaeological Monitoring	n/a	278631	187885
120	n/a	GGATE003718	n/a	Marlas-Raos Sewage Pipeline	Archaeological Monitoring	n/a	n/a	n/a
121	n/a	n/a	n/a	Project Cronus, Port Talbot TATA Steelworks	Geophysical Survey	n/a	n/a	n/a

Non-designated heritage assets

Stantec Reference	CADW Reference	Heneb Reference	RCHAMW Reference	Name	Type	Period	Easting	Northing
83	n/a	GGAT00737w	n/a	Findspot, Margam	Findspot	Prehistoric	278300	187620
84	n/a	GGAT00734w	n/a	Cantusus Stone	Milestone	Romano-British	278340	187330
85	n/a	GGAT00739w	n/a	Findspot, Margam Moors	Findspot	Romano-British	277420	186520
86	n/a	RR60c-05a	n/a	Roman Road	Road	Romano-British	280160	185192
87	n/a	GGAT00740w 00740w	19331	Hen Biniwn; Middle Burrows Grange, New Grange	Grange	Medieval	278150	186050
88	n/a	GGAT00746w 00746w	305628	Fynnon Pedr	Well	Medieval	279530	186540
89	n/a	GGAT01378w 01378w	n/a	Bromail Coal Level	Colliery	Post-Medieval	279400	187100
90	n/a	GGAT01731w	18103	Brombil Farm	Farm	Post-Medieval	278900	187500
91	n/a	GGAT01993w 01993w	n/a	House Platform, Tai Bach	House platform	Post-Medieval	278670	188030

92	n/a	GGAT04599w	n/a	Gravel pit, Margam	Gravel pit	Post-Medieval	279710	186270
93	n/a	GGAT05361w 05361w	n/a	Brombil Farm, Margam 5	Cottage	Post-Medieval	279090	187780
94	n/a	GGAT08427w	n/a	Cattle pound, Margam	Pound	Post-Medieval	279641	186117
95	n/a	GGAT09512w	n/a	Careg-y-rhiw Farm	Farmstead	Post-Medieval	277953	187493
96	n/a	GGAT09513w	n/a	Stallcourt Farmstead	Farmstead	Post-Medieval	278188	187798
97	n/a	GGAT09514w	n/a	Wern Farmstead	Farmstead	Post-Medieval	278606	187710
98	n/a	GGAT09515w	20221	Ty'n-y-caeau Farmstead	Farmstead	Post-Medieval	279268	186385
99	n/a	GGAT09608w	n/a	Ty'l'r-Gigfran Farmstead	Farmstead	Post-Medieval	279185	187631
100	n/a	GGAT09690w	n/a	Ty Isaf Farmstead	Farmstead	Post-Medieval	278931	187313
101	n/a	GGAT10677w	n/a	Margam Toll Gate	Toll gate	Post-Medieval	278383	187282
102	n/a	n/a	710277	Morfa Colliery Gas Works	Gas works	Post-Medieval	277527	186359
103	n/a	n/a	421174	Morfa Colliery, Taibach	Colliery	Post-Medieval	277531	186420
104	n/a	n/a	302334	Groes School	School	Post-Medieval	279061	186930
105	n/a	n/a	19292	Margam Castle, Middle Lodge	Lodge	Post-Medieval	279001	186000
106	n/a	n/a	240757	Ship's Timber Find, Kenfig	Wreck	Post-Medieval	278087	186371
107	n/a	GGAT04601w 04601w	412352	Stone Circle, Margam	Gorsedd Circle	Modern	279620	186380
108	n/a	GGAT07274w 07274w	n/a	Structure, Margam	Structure	Modern	278985	187585
109	n/a	GGAT07275w 07275w	n/a	Structure, Margam	Structure	Modern	279006	187607

110	n/a	GGAT07313w 07313w	n/a	Structure, Margam	Structure	Modern	279124	187331
111	n/a	GGAT08006w	n/a	Supermarine Spitfire (Mk I X4722)? crash site	Air crash site	Modern	n/a	n/a
112	n/a	GGAT09017w	n/a	Small arms range, Lower Mother	Firing range	Modern	277880	185400
113	n/a	GGAT09023w	n/a	St David's Church, Ty Fry Road, Tai Bach	Church	Modern	278387	187593
114	n/a	n/a	705147	Junction 38, M4, Margam	Industrial Estate	Modern	279501	186800
115	n/a	n/a	268150	British Oxygen Company Works, Margam	Gas Works	Modern	278971	185920
116	n/a	n/a	91392	Abbey Works, Margam Steel Works, Margam, Port Talbot Complex;Corus;Tata	Steel Works	Modern	277901	186800
118	n/a	GGAT07278w 07278w	n/a	Bronbil Colliery and Tramway	Colliery	Modern	279366	187885
117	n/a	GGAT01079w	n/a	Groes Settlement	Settlement	Undated	279600	186200

Appendix C Setting Scoping Exercise

Asset Group	Asset Type	Name	Stantec Reference Number	CADW Reference Number	Associated Registered Historic Landscape	Setting
Ann Francis	Scheduled Monument	Wrecking Site of the Ann Francis	11	4453	None	Site of the wrecking of the Tudor merchant ship, the Ann Francis, approximately 1.8km east of the Site. The setting of the asset is defined by the intertidal zone on Morfa Beach. This asset derives its significance from its evidential and historical interest which is restricted to this setting in which the ship was wrecked. As such, the Site is not considered to form part of the setting of this asset or make a contribution to its interests and significance.
Tollgate Park	Grade II* Listed Building	Beulah Calvinistic Methodist Chapel	22	14172	None	These assets were removed from their original position and relocated to Tollgate Park in 1974 during construction of the M4 motorway. The original setting has therefore been lost and the assets now derive their significance from their aesthetic and historical interest, key to which is their legibility as a group which is best experienced from their current immediate setting within the park. The Site therefore does not have the capacity to influence the significance of these assets as part of their setting.
	Grade II Listed Building	Vestry at Beulah Chapel	67	23282		
		Gates, Piers and Railings at Beulah Chapel	68	23283		
		Milepost at Tollgate Park	69	23284		
Port Talbot	Grade II* Listed Building	Church of St Theodore	20	14160	None	The setting of these assets situated within the urban extents of Port Talbot are best defined by the immediate streetscape, its urban character, and surrounding contemporary historic assets. The setting of the town is also defined by its coastal location, with the port having played a significant part in its industrial growth from the post-medieval period onwards. There are no views, designed or fortuitous, between the Site and these assets due to the level topography and the intervening industrial buildings associated with the modern steelworks which are visually and experientially dominant in the landscape surrounding Port Talbot. As such, the Site does not make a material contribution towards the interest and significance of these assets.
		War Memorial	23	23256		
	Grade II Listed Building	Plaza Cinema	38	22136		
		Gibeon Chapel	39	22806		
		Carnegie Free Library	40	22807		
		Milepost	41	22808		
		Harbour Court	42	23152		
		Former Harbour House	43	23154		
		Holy Cross Church	44	23248		
		Dyffryn Chapel	45	23253		

		Gateway to Talbot Memorial Park	46	23255		
		Fountain in Honour of John Hopkin Davies	47	23257		
		Bandstand	48	23258		
		Lodge 2, Talbot Memorial Park	49	23259		
		Lodge 1, Talbot Memorial Park	50	23260		
	Grade II Listed Registered Park and Garden	Talbot Memorial Park, Port Talbot	74	PGW(Gm)45(NEP)		
Margam Crematorium	Grade II Listed Building	Margam Crematorium	27	87732	None	Modern crematorium which derives its significance from its architectural and historic interest as a fine example of a post-war crematorium. There are no discernible historic associations between the Site and the crematorium and no direct views, designed or fortuitous, which make a material contribution to the significance of the asset. As such, the Site does not form part of the setting of the crematorium which makes a material contribution to its interest and significance.
Ty'n-y-kenfig Standing Stone	Scheduled Monument	Ty'n-y-Cellar Standing Stone	4	2256	None	Bronze Age standing stone located approximately 2.2km from the Site. There are no discernible historic associations between the asset and the Site, with no further funerary monuments of this date being recorded within the intervening low-lying landscape. The intervening built form, green screening and distance prevent any clear views between the Site and the asset and therefore it is not considered to have the capacity to influence the significance of this asset as part of its setting.
Barn at Eglwys Nunydd	Grade II Listed Building	Barn at Eglwys Nunydd	29	14157	Margam mountain	Post-medieval barn with medieval origins, located approximately 1.6km southeast of the Site. The building is likely to relate to a monastic grange. The landscape surrounding the barn is now largely residential in nature diluting its legibility as an agricultural building, and part of a monastic grange. These buildings also restrict any views between the Site and the asset and there is no known historic relationship. As such, the Site does not

						form part of the setting from which it draws its significance.
Margam Milestones	Grade II Listed Building	Milepost near Margam Park Entrance	70	23285	Margam mountain	The setting of both mileposts is intrinsically defined by their roadside setting from which they derive their interests and from where these are best experienced. The relationship between the mileposts and the road is a key element in their legibility as assets associated with the historic transport network. The Site does not form part of this roadside setting and as such does not have the capacity to influence the significance of these assets as part of their setting.
		Milepost near Old Park	71	23286		
Twyn yr Hydd	Grade II Listed Building	Gateway and Quadrant Walls Leading to Twyn yr Hydd	37	14169		Self-contained historical estate located within Margam Park, approximately 2.2km east of the Site. The buildings hold inherent group value, deriving significance from their aesthetic interest as an example of Victorian Old English Style, and from their historic association with the Talbot family and the Margam Estate. The immediate setting consists of the grounds within which the house and ancillary buildings are located, and from which their aesthetic value can be best appreciated. The wider setting comprises Margam Park. There is no known historic association between the Site and Twyn yr Hydd. The intervening built form, green screening, topography and distance also prevent any clear views between the Site and these assets and as such the Site does not have the capacity to influence the significance of these assets as part of their setting.
		Twyn yr Hydd	51	23263		
		Farm Building at Twyn yr Hydd	63	23277		
		Kitchen Garden Wall and Glass House at Twyn yr Hydd	64	23279		
		Garden Wall at Twyn yr Hydd	65	23280		
		Entrance to Twyn yr Hydd and Flanking Walls	66	23281		
Margam Park	Grade I Registered Park and Garden	Margam Park	75	PGW(Gm)52(NEP)		Margam Park is located approximately 920m from the Site, in the Margam Mountain Historic Landscape. The Park itself is post-medieval in date but contains multi-layered evidence of continued human occupation in the area from the prehistoric period through to today. Individually, the assets derive their significance from varied interests but as a group their significance
	Scheduled Monument	Margam Medieval Bath House	1	828		
		Margam Abbey	6	2854		

		Margam Inscribed & Sculptured Stones	7	2861		primarily derives from this continuity of occupation, demonstrating the importance of the location throughout time. Within this wider group are smaller groupings of assets with shared significance such as the medieval ecclesiastical remains centred on Margam Abbey and the assets which form part of the post-medieval Margam Estate including the Grade I Listed Margam Castle. Although these groups of assets differ in terms of key and immediate setting, they share a common wider setting of the slopes of the Margam mountain overlooking the low-lying coastal land to the east, which formed part of the later Margam Estate. The HER entry for Hen Biniwn (SN:121) notes that the grange was historically connected to Margam Abbey by a paved causeway, the route of which may have followed the line of Heol y Deiliaid which ran along the boundary of the Site. The line of the road appears to be preserved by two parallel ditches. However, the legibility of any historic association between the grange and abbey has been eroded by the modern industrial landscape which includes visually dominant buildings of a much larger scale than the proposed substation extension. Whilst the presence of any contemporary remains associated with the trackway that may survive within the Site could aid our understanding of its historic context and associations our inability to place it spatially within that landscape inhibits any further meaningful contribution to the Abbey's/Margam Park's significance. The Site therefore does not have the capacity to influence the significance of these assets as part of their setting.
	Grade I Listed Building	St Mary's Abbey Church	12	14148		
		Ruins of Chapter House and Vestibule of St Mary's Abbey	13	14149		
		Ruined Undercroft at St Mary's Abbey	14	14150		
		Margam Orangery	15	14152		
		Ivy Cottage including Facade of Former Banqueting House	16	14153		
		Margam Castle	17	14170		
	Grade II* Listed Building	Hen Eglwys	18	14155		
		Terrace Walls and Screen at Margam Castle	21	14163		
		Terrace with Pools and Flower Beds Fronting Margam Orangery	24	23267		
		Monastic Baths	25	23274		
		Service Buildings including Courtyard Walls at Margam Castle	26	23278		
		Old Park	19	14158		
	Grade II Listed Building	Almshouses	28	14151		
		Churchyard Walls and Gate Piers to St Mary's Abbey Church	30	14161		
		Kitchen Garden Walls including Vinery Glasshouse	31	14162		
		Middle Lodge	32	14164		

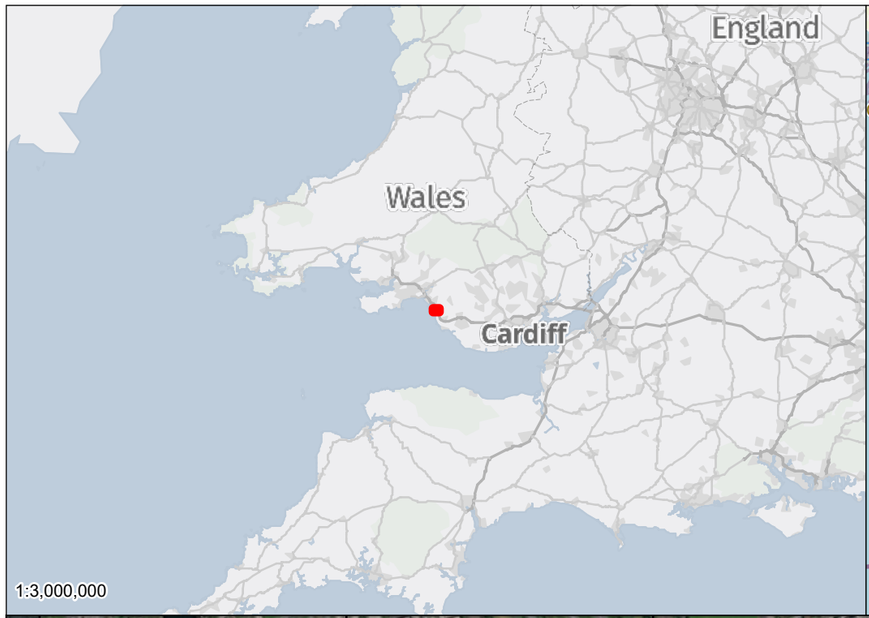
		Cwm Cottage	33	14165		
		Margam Cottage	34	14166		
		2 Grove Cottages	35	14167		
		Piers and Gates at East Lodge and Flanking Walls	36	14168		
		Citrus House	52	23264		
		Retaining Wall adjoining Citrus House	53	23265		
		Stone Steps in Terraced Garden	54	23266		
		Turbine House	55	23268		
		Stones Museum	56	23269		
		War Memorial	57	23270		
		Pair of Gate Piers to the Former Margam House	58	23271		
		Ornamental Pool	59	23272		
		Former Changing Room	60	23273		
		Broadwalk Steps	61	23275		
		Arch over Culvert	62	23276		
		3 Grove Cottages	72	23293		
	Conservation Area	Margam Park	73	n/a		
Margam mountain Camps	Scheduled Monuments	Half Moon Camp	5	2298		Group of three Iron Age defended enclosures in close proximity to each other, located in prominent positions within the Margam mountains, two of which are within Margam Park. Hen Eglwys contains a medieval chapel within. There are no discernible direct historic associations between the Site and these assets. The elevated positioning of these assets results in visibility across the Site, however views are obscured by intervening distance (all greater than 1km) and vegetation. The landscape within which the Site is
		Mynydd y Castell Camp	9	2869		

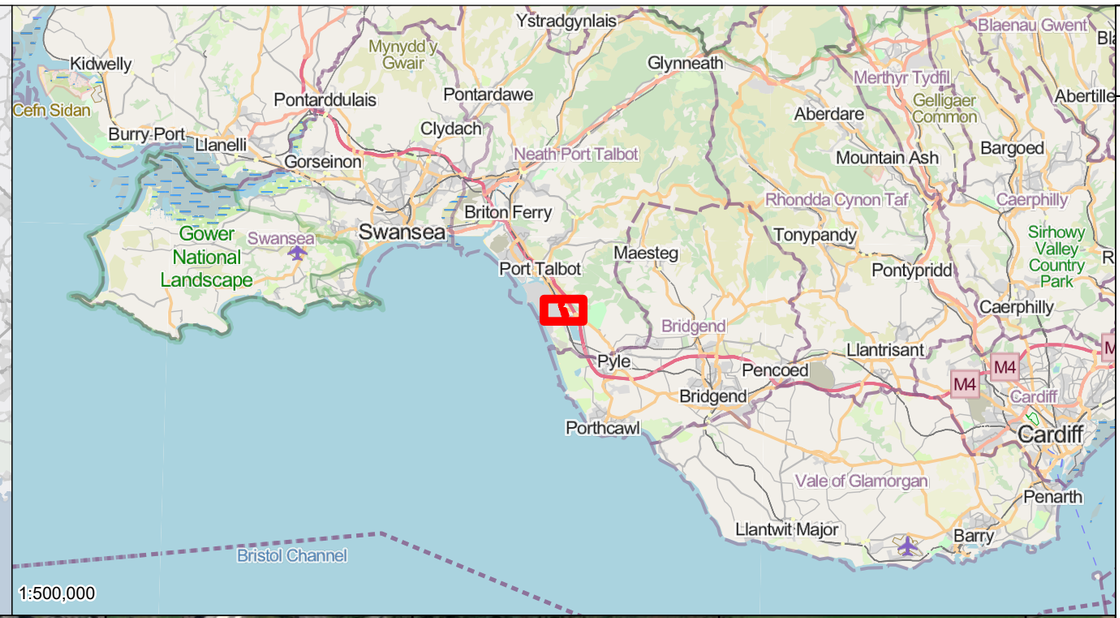
		Hen Eglwys Chapel and Defended Enclosure	10	2870		located is highly developed and industrialised, including visually dominant buildings of a much larger scale than the proposed substation extension. The Site therefore does not have the capacity to influence the significance of these assets as part of their wider setting nor impact upon the ability to experience the assets in their key and immediate settings.
Chain Home Low Radar Station	Scheduled Monument	Chain Home Low Radar Station, Margam	2	1424		Second World War radar station located approximately 830m east of the Site. The setting of the radar station is defined by its topographic and strategic location near the coast and positioned to protect Port Talbot and the Bristol Channel, which is intrinsically linked to its functional and intended use. The visual dominance of the radar station is functional rather than by design with any views across the surrounding landscape, including the Site, fortuitous rather than intentional. There are also no discernible historic associations between the Site and the asset. The Site therefore does not have the capacity to influence the significance of these assets as part of their wider setting nor impact upon the ability to experience the assets in their key and immediate settings.
Margam Mountain Barrows	Scheduled Monument	Ergyd Uchaf Round Barrow	3	2250		Group of round barrows located on the hillslopes to the northeast of Site. There are no discernible historic associations between the Site and the assets. The elevated positioning of these assets results in visibility across the Site, particularly from Ergyd Uchaf, however views are partially obscured by intervening distance (all greater than 1km) and vegetation. The landscape within which the Site is located is highly developed and industrialised, including visually dominant buildings of a much larger scale than the proposed substation extension. The Site therefore does not have the capacity to influence the significance of these assets as part of their wider setting nor impact upon the ability to experience the assets in their key and immediate settings.
		Ergyd Isaf Round Barrows	8	2868		

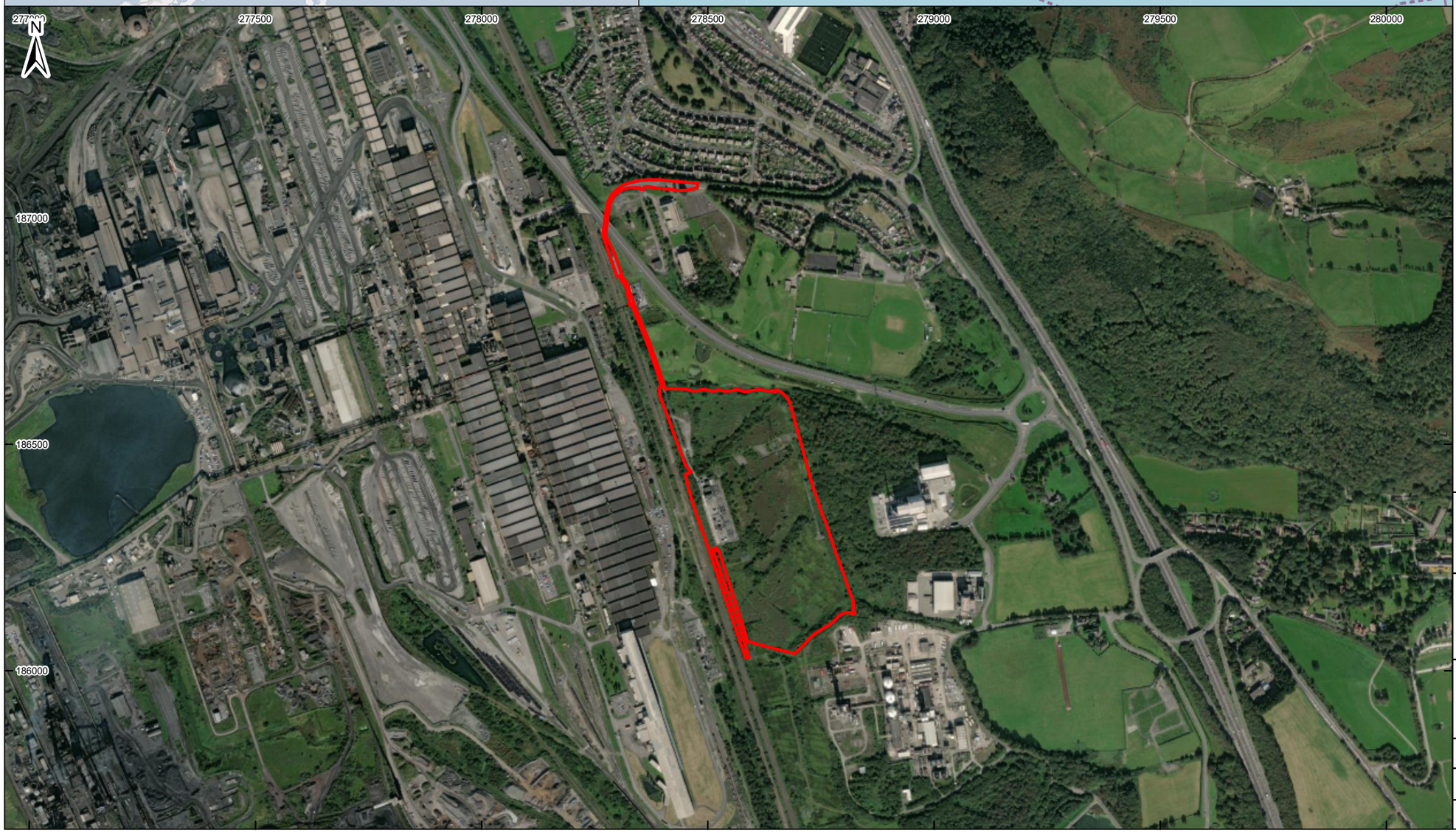
Margam Mountain	Registered Historic Landscape	Margam Mountain	77	HLW (WGI/MGI) 2		Margam Mountain encompasses evidence of continuous occupation from the prehistoric period onwards, particularly on its southern flanks which overlook the coastal plain in which the Site is located. This continuous occupation is partly due to its strategic location adjacent to the key early routes into west Wales but also to the range of environments and resources accessible within the mountain landscape itself and in its environs. Its elevated location provides extensive views across the coastal plain within which the Site is located and which forms part of its wider setting. However, this setting has been significantly altered in the last century with the steel works and urban expansion of Port Talbot now providing the dominant prospects in any views towards the sea. As stated in the Cadw Registered Historic Landscape Report, this represents an example of a new landscape in complete visual contrast with, and out of all proportion to, the earlier, adjacent, more subtly grafted landscape. As the Site is located in close proximity to existing dominant industrial architecture, changes to its use and / or appearance are not considered to have the capacity to influence the landscape's significance.
Merthyr Mawr, Kenfig & Margam Burrows	Registered Historic Landscape	Merthyr Mawr, Kenfig & Margam Burrows	66	HLW (MGI) 1	Merthyr Mawr, Kenfig & Margam Burrows	Merthyr Mawr and Kenfig and Margam Burrows are two discrete areas of dunes located to the south of the Site which derive their significance from their evidential and historical interest as excellent examples of sand buried archaeological sites. Merthyr Mawr is located at the southernmost end of the Registered Landscape outside of the 3km Study Area and is geographically separate from Kenfig and Margam Burrows. On the basis of this the Site does not form part of the setting of these assets which makes a material contribution to their significance. The northernmost extent of Kenfig and Margam Burrows is located approximately 600m southeast of the Site. The key and immediate setting of the landscape is the dune system itself from which its significance is best appreciated, both experientially and visually. The wider setting encompasses the coastal plain within which the Site is included, however, this setting has been significantly altered in the last century with the construction of the steel works and the urban expansion of Port Talbot. Intervisibility between the Burrows and

						the Site is probable however the Site is situated within an area of industrial architecture which already provides the dominant prospect in any views towards the Site and as such changes to its use and / or appearance are not considered to have the capacity to influence the landscape's significance.

Appendix D Figures







Stantec

Site

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Margam, Port Talbot, National Grid Upgrade Works - Substation Extension

Site Location

0 250 500 Meters

1:10,000 @ A3	14/08/2025
Drawn: BH	Checked: RL
Figure: 1	Rev A

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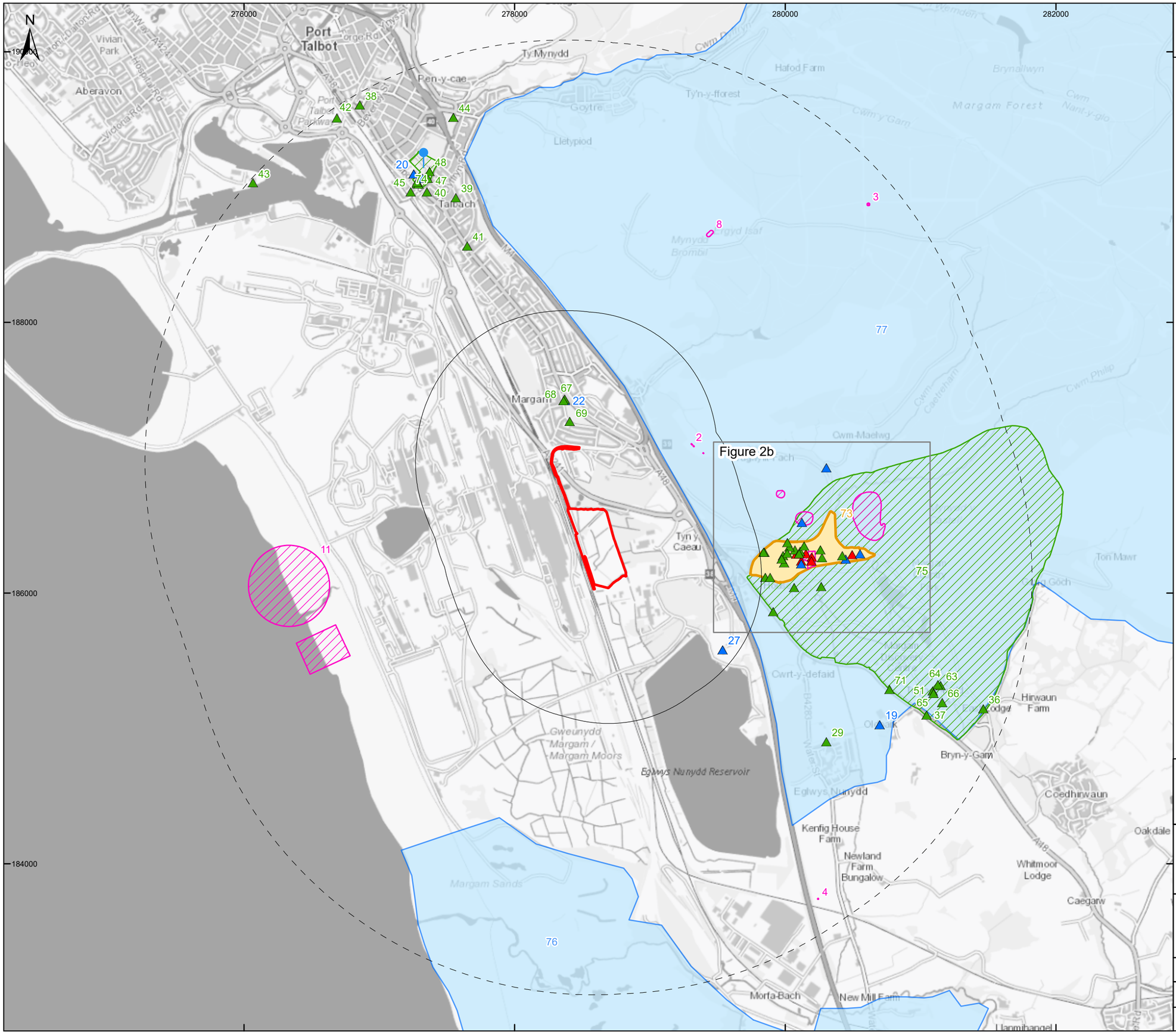

Stantec

- Site
- 1km Study Area - Non-Designated Heritage Assets
- 3km Study Area - Designated Heritage Assets

Designated Heritage Asset

- Conservation Area
- Scheduled Monuments
- Registered Park and Garden
- Registered Historic Landscape
- Grade I Listed Building
- Grade II* Listed Building
- Grade II Listed Building

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Margam, Port Talbot, National Grid Upgrade Works - Substation Extension

Designated Heritage Assets

0 750 1,500 Meters

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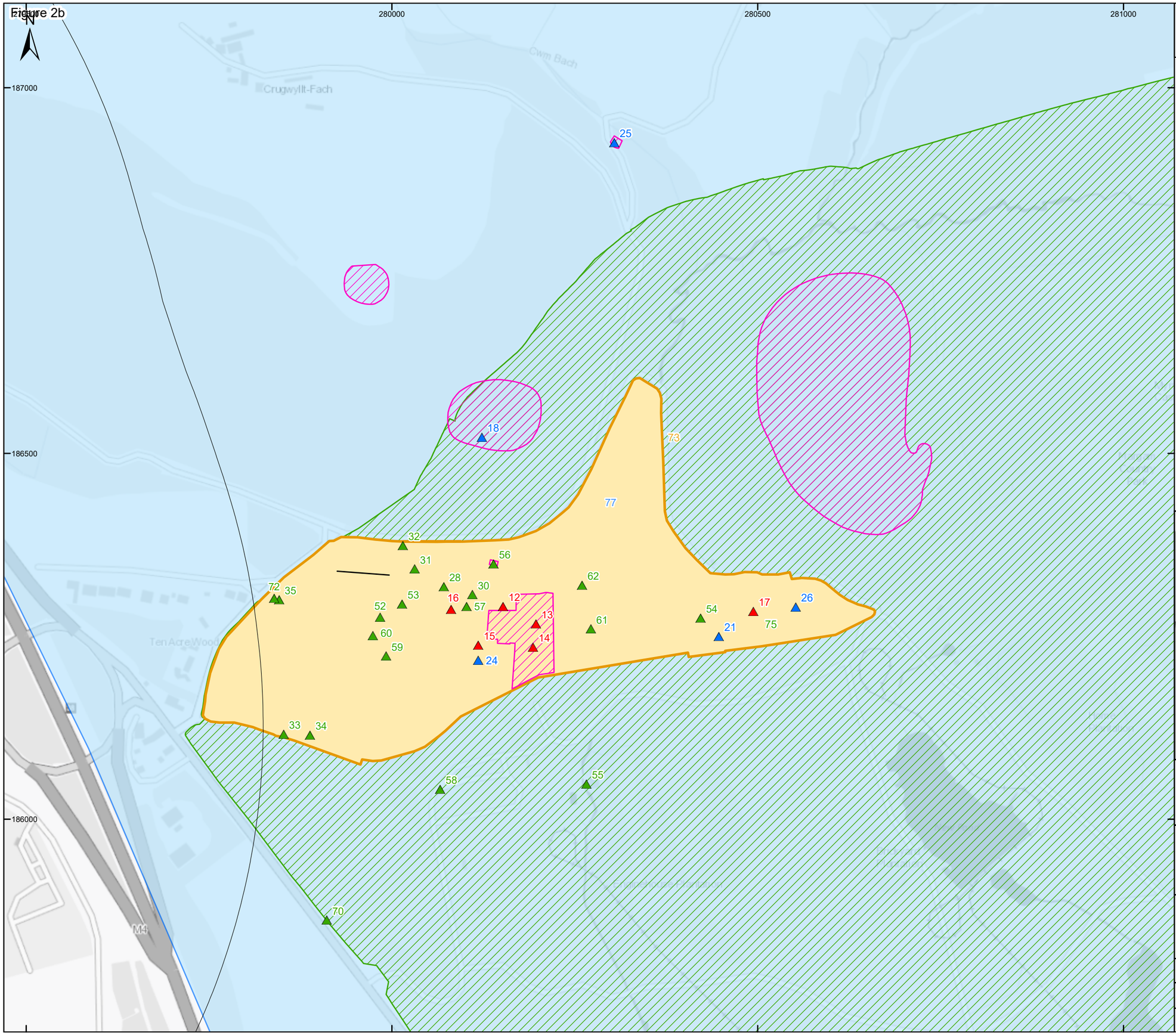
Figure 2b

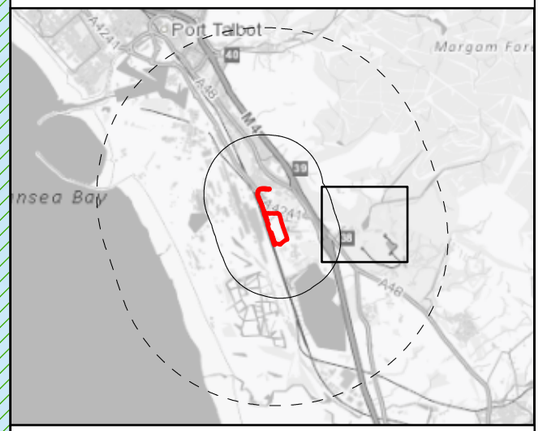


Stantec

- Site
- 1km Study Area - Non-Designated Heritage Assets
- 3km Study Area - Designated Heritage Assets

Designated Heritage Asset

- Conservation Area
- Scheduled Monuments
- Registered Park and Garden
- Registered Historic Landscape
- Grade I Listed Building
- Grade II* Listed Building
- Grade II Listed Building



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Margam, Port Talbot, National Grid Upgrade Works - Substation Extension

Designated Heritage Assets

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Drawn: BH	Checked: RL
Figure: 2b	Rev: A

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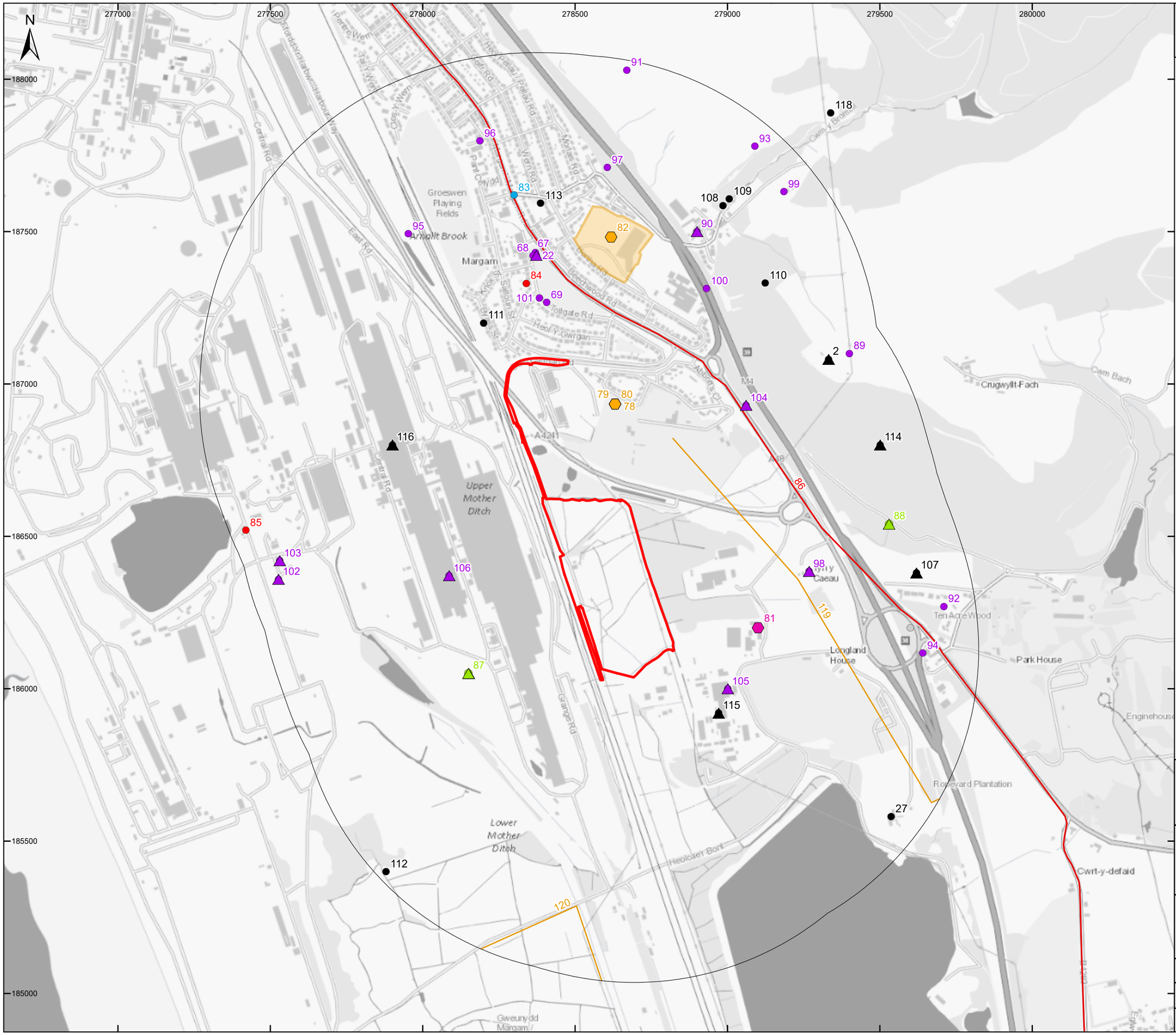

Stantec

- Site
- 1km Study Area - Non-Designated Heritage Assets

Historic Environment Record Monument

- Prehistoric
- Romano-British
- Medieval
- Post-Medieval
- Modern
- Undated
- Early Medieval
- Medieval
- Post-Medieval
- Modern
- Roman Road

National Monuments Record Wales Asset

- Medieval
- Post-Medieval
- Modern

Historic Environment Record Event

- Evaluation
- Excavation
- Archaeological Monitoring and Recording
- Archaeological Monitoring and Recording
- Archaeological Monitoring and Recording

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Margam, Port Talbot, National Grid Upgrade Works - Substation Extension

Historic Environment Record and National Monument Record of Wales Data

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Drawn: BH	Checked: RL
Figure: 3	Rev A

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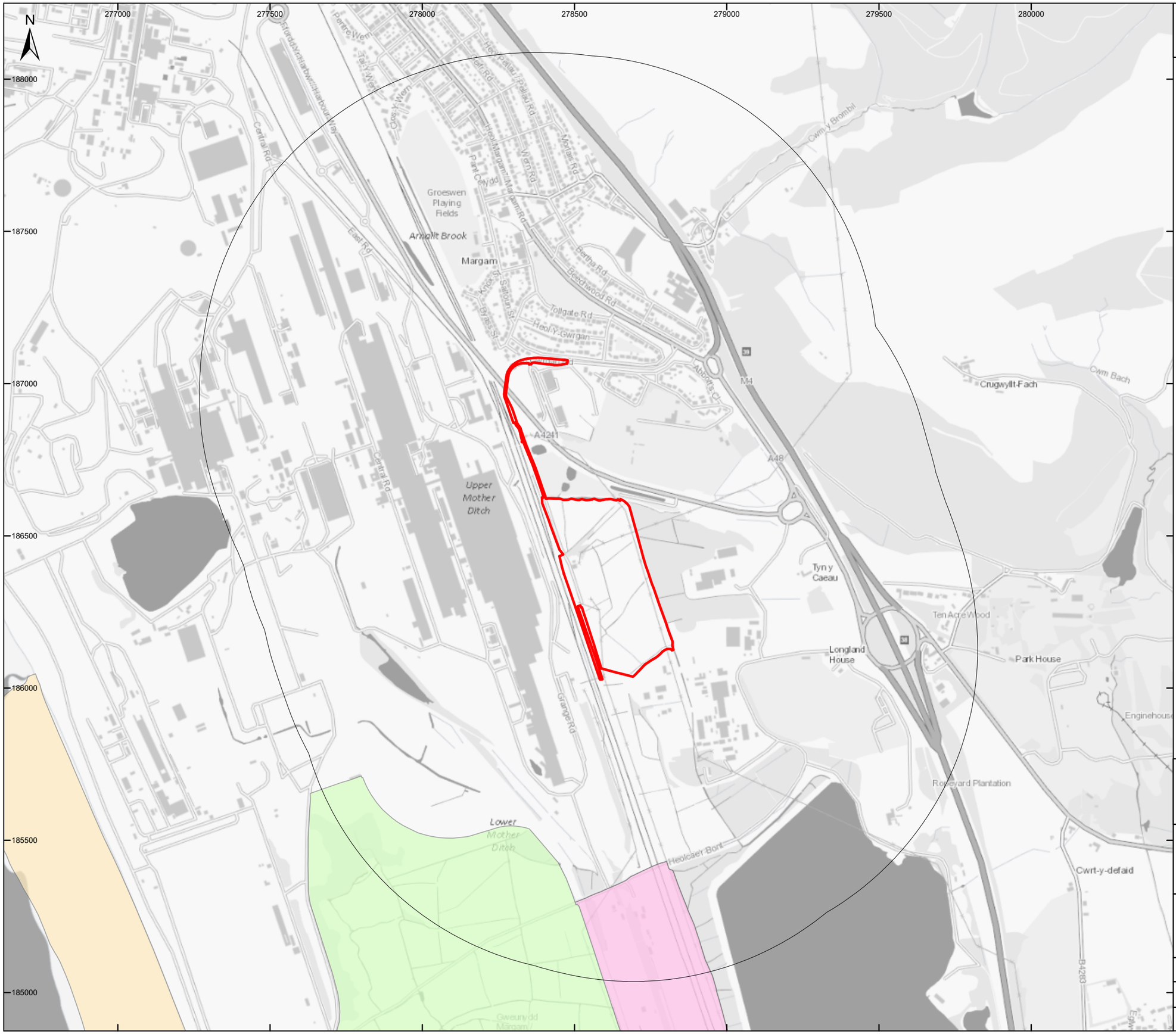

Stantec

- Site
- 1km Study Area - Non-Designated Heritage Assets

Historic Landscape Character

- Margam Moors
- Margam and Kenfig Burrows
- South Wales Main Line

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Margam, Port Talbot, National Grid Upgrade Works - Substation Extension

Historic Landscape Character Areas

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Figure: 4	Rev A

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Stantec

Site

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Margam, Port Talbot, National Grid Upgrade Works - Substation Extension

LiDAR - Simple Local Relief Model Visualisation

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Figure: 5	Rev A

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