



Parc Pelenna

FINAL DRAFT

**Archaeological and
Heritage Assessment**

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(edp6556_d003a 12 April 2024 PDr/EBR)

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Non-technical Summary

- S1 This report has been prepared by the Environmental Dimension Partnership Ltd (EDP) on behalf of Trivselhus UK Holdings Limited and presents the results of an Archaeological and Heritage Assessment of Parc Pelenna, Fairyland Road, Neath (hereafter referred to as 'the Site') assessing the effect of the development of the Site for holiday lodges and associated facilities.
- S2 This Archaeological and Heritage Assessment concludes that the Site contains one designated asset, the scheduled monument known as Pen-Rhiw-Angharad Round Cairns, thought to date from the Bronze Age, where there would be a presumption in favour of its physical retention or preservation *in situ*.
- S3 The assessment concludes that the form of development proposed will have no effect on the significance of this asset either directly or due to change within its setting. Furthermore, the development proposes an interpretation board at the Round Cairns that would potentially comprise a minor benefit to the scheduled monument and its significance.
- S4 Two scheduled monuments and three Grade II listed buildings are located within a 1km radius of the Site. The assessment concludes that the significance of these assets will not be affected by the proposed development.
- S5 The Site contains earthwork remains relating to late 19th and early 20th century coal mining. These earthworks are assessed as historic assets of low significance and, for the most part, will be retained within the Site. There will, however, be some localised loss of earthworks and buried remains relating to the former Cefn Mawr Colliery, resulting in a minor negative impact. Otherwise, whilst the setting of the industrial remains will be altered, this is assessed as resulting in an overall neutral consequence, as a result of both positive and negative effects.
- S6 Based on the sources consulted to inform this report, the Site has the potential for cairns, or other funerary or ritual features of the Bronze Age to be located within dense woodland on the Site's higher south-eastern slopes. No development is proposed in these areas, so even if present these features will not be affected by the proposal.
- S7 Beyond the heritage assets identified above, the Site has very low potential for any archaeological remains of any other period other than very low value remains related to post-medieval land organisation and agriculture.
- S8 Groundworks that will be required for the development would be focussed in the central area of the Site and here this assessment has concluded that the archaeological remains are of 19th and 20th century date and of very low significance, the loss of which should be acceptable. A programme of archaeological recording may be required during development, the scope of which would be defined by Neath Port Talbot County Borough Council (NPTCBC) (presumably via a planning condition) on the advice of their archaeological advisors, Glamorgan Gwent Archaeological Trust (GGAT).

- S9 In conclusion, the proposed development of the Site for holiday lodges and associated facilities would not contravene any heritage legislation and would accord with the Welsh Government's objectives for the historic environment as set out in PPW 12 (2024), and with the policies of the NPTCBC LDP (2016).

Crynodeb an-nhechnegol

- S1 Paratowyd yr adroddiad hwn gan 'Environmental Dimension Partnership' (EDP) ar ran 'Trivselhus UK Holdings Limited'. Mae'r adroddiad yn dangos canlyniadau Archeolegol a Threftadaeth asesiad ar Barc Pelenna, Ffordd Fairyland, Nedd (cyfeirir ati o hyn ymlaen fel 'y Safle'). Byddai'r adroddiad yn asesu'r effaith i ddatblygu'r safle i borthdai gwyliau a chyfleusterau cysylltiedig.
- S2 Mae'r Asesiad Archeolegol a Threftadaeth hwn yn dod i'r casgliad bod y Safle yn cynnwys un ased dynodedig, sef yr heneb gofrestredig a elwir yn Garneddi Crwn Pen-Rhiw-Angharad. Credir ei bod yn dyddio o'r Oes Efydd, lle byddai rhagdybiaeth o blaid ei gadw neu ei warchod yn ei lle.
- S3 Daw'r asesiad i'r casgliad na fydd y math o ddatblygiad a gynigir yn cael unrhyw effaith ar arwyddocâd yr ased hwn naill ai'n uniongyrchol neu oherwydd newid yn ei osodiad. Ymhellach, mae'r datblygiad yn cynnig bwrdd dehongli yn y Carneddi Crwn a fyddai o bosibl o fudd bychan i'r heneb gofrestredig a'i harwyddocâd.
- S4 Mae dwy heneb gofrestredig a thri adeilad rhestredig Gradd II wedi'u lleoli o fewn radiws 1km i'r Safle. Daw'r asesiad i'r casgliad na fydd arwyddocâd yr asedau hyn yn cael ei effeithio gan y datblygiad arfaethedig.
- S5 Mae'r Safle'n cynnwys olion gwrthglawdd yn ymwneud â chloddio am lo o ddiwedd y 19eg ganrif a dechrau'r 20fed ganrif. Asesir y gwrthgloddiau hyn fel asedau hanesyddol o arwyddocâd isel ac, i raddau helaeth, byddant yn cael eu cadw o fewn y Safle. Fodd bynnag, bydd rhai gwrthgloddiau a gweddillion cladd yn ymwneud â hen Lofa Cefn Mawr yn cael eu colli'n lleol, gan arwain at fân effaith negyddol. Fel arall, tra bydd gosodiad yr olion diwydiannol yn cael ei newid, asesir bod hyn yn arwain at ganlyniad niwtral cyffredinol, o ganlyniad i effeithiau cadarnhaol a negyddol.
- S6 Yn seiliedig ar y ffynonellau yr ymgynghorwyd â nhw i hysbysu'r adroddiad hwn, mae gan y Safle potensial i garneddau, neu nodweddion angladdol neu ddefodol eraill o'r Oes Efydd gael eu lleoli o fewn coetir trwchus ar lethrau de-ddwyreiniol uwch y Safle. Ni chynigir unrhyw ddatblygiad yn yr ardaloedd hyn, felly hyd yn oed os ydynt yn bresennol ni fydd y nodweddion hyn yn cael eu heffeithio gan y cynnig.
- S7 Y tu hwnt i'r asedau treftadaeth a nodir uchod, ychydig iawn o botensial sydd gan y Safle ar gyfer unrhyw olion archeolegol o unrhyw gyfnod arall heblaw olion gwerth isel iawn sy'n gysylltiedig â threfniadaeth tir ôl-ganoloesol ac amaethyddiaeth.
- S8 Byddai'r gwaith daear y bydd ei angen ar gyfer y datblygiad yn cael ei ganolbwyntio ar ardal ganolog y Safle ac yma mae'r asesiad hwn wedi dod i'r casgliad bod yr olion archeolegol yn dyddio o'r 19eg ganrif a'r 20fed ganrif ac o arwyddocâd isel iawn, a dylai eu colli fod yn dderbyniol. Mae'n bosibl y bydd angen rhaglen o gofnodi archeolegol yn ystod y datblygiad, a byddai ei chwmpas yn cael ei ddiffinio gan Gyngor Bwrdeistref Sirol Castell-nedd Port Talbot (CBSCNPT) (drwy amod cynllunio yn ôl pob tebyg) ar gyngor eu cynghorwyr archeolegol, Ymddiriedolaeth Archeolegol Morgannwg Gwent (GGAT).

- S9 I gloi, ni fyddai datblygiad arfaethedig y Safle ar gyfer cabanau gwyliau a chyfleusterau cysylltiedig yn mynd yn groes i unrhyw ddeddfwriaeth treftadaeth a byddai'n cyd-fynd ag amcanion Llywodraeth Cymru ar gyfer yr amgylchedd hanesyddol fel y nodir ym Mholisi Cynllunio Cymru 12 (2024), a chyda pholisïau NPTCBC LDP (2016).

Section 1 Introduction

- 1.1 This report has been prepared by the Environmental Dimension Partnership Ltd (EDP) on behalf of Trivselhus UK Holdings Limited and presents the results of an Archaeological and Heritage Assessment at Parc Pelenna, Fairyland Road, Neath (hereafter referred to as 'the Site').
- 1.2 The first aim of this assessment is to consider the available historical and archaeological resources for the Site and to establish its likely potential to contain historic assets in accordance with Welsh Government guidance in Planning Policy Wales Edition Twelve (PPW), Technical Advice Note 24 (TAN 24) and local planning policy.
- 1.3 In accordance with good practice and guidance, desktop sources have been augmented through the completion of a walkover survey, which in this case was undertaken in January 2024.
- 1.4 The second aim of this assessment is to identify and assess the potential for development within the site to affect historic assets, either directly or through changes within their setting, and to determine whether, and to what extent, those changes might affect their heritage significance.

LOCATION AND BOUNDARIES

- 1.5 The site measures 45.8 hectares (ha) in area and is centred on National Grid Reference (NGR) 277434, 198192; its location and layout are shown on **Plan EDP 1**.
- 1.6 The Site is located on north-west facing slopes on the south-eastern flank of the Vale of Neath. It is approximately 850m south-west of the village of Clyne, approximately 1.6km east of the village of Tonna and c.3.6km east of the town of Neath, at its closest points.
- 1.7 The Site mainly comprises woodland, both deciduous woodland and, on its higher southern slopes, coniferous plantations. A dwelling is located centrally in the western part of the Site at Pen-Rhiw-Angharad consisting of a house with several outbuildings set within landscaped gardens that include a pond. To the south of the house, on a plateau of land with a gentler slope are several enclosed grassed fields that are associated with the dwelling. Elsewhere within the Site the plots of woodland are divided by substantial banks and ditches with a stone wall defining the Site's southern boundary.
- 1.8 The Site has a rough, semi-upland character and is crossed by numerous tracks and paths, most of which follow the contours, and which are derived from the Site's former industrial use. The central and southern parts of the Site are steepest and most densely wooded with much of the Site impassable.
- 1.9 The proposed access route from the valley to the north winds up through grassed fields located on the lower slopes of the valley before entering woodland and following an existing track.

- 1.10 Beyond the Site boundaries to the south is the crest of the slope and the Pelenna Forest, which occupies the upland extents and slopes above the Cwm Blaen Pelenna, which lies further south-east. A track follows the ridge-top to the east passing through the forest. To the south-west and north-east is further land of a similar character to that of the Site comprising woodland and rough, enclosed grassland used for grazing. To the north is the valley bottom where the River Neath winds through its grassed flood plain. Running along parallel with the river is the Neath Canal. A railway line, the A465 and the B4434 also run along the valley bottom.

GEOGRAPHY AND TOPOGRAPHY

- 1.11 Topographically, the Site is located on a north-west facing slope, which varies in steepness with the upper slopes less steep than the lower slopes. It is at c.270m above Ordnance Datum (aOD) at its highest point on the southern boundary, descending to c.145m aOD along its north-western boundary, and to c.53m aOD at its most northern point (at the north-west corner of the Site) where the access road is proposed to join the B4434.
- 1.12 The British Geological Survey (BGS) records the underlying bedrock geology at the Site as predominantly of Hughes Member (mudstone, siltstone and sandstone) formation, a sedimentary bedrock formed between 309.5 and 308 million years ago during the Carboniferous period. The more northern parts of the Site are recorded as Brithdir Member (sandstone) a sedimentary bedrock formed between 309.5 and 308 million years ago during the Carboniferous period. The sandstone in the site overlays coal measures of the South Wales coalfield.
- 1.13 A single superficial deposit is recorded by the BGS within the Site, comprising a small area of peat, located at the south-west corner of the Site. This peat deposit is a sedimentary superficial deposit formed between 2.588 million years ago and the present during the Quaternary period (bgs.ac.uk).

PROPOSED DEVELOPMENT

- 1.14 An outline planning application is to be submitted to Neath Port Talbot County Borough Council (NPTCBC) for development of private holiday lodges, on land located between the settlements of Tonna and Resolven. The proposed scheme would create a premium holiday-resort development comprising those lodges, other supporting leisure, hospitality, and service facilities, as well as a new access road and associated infrastructure.
- 1.15 The proposal includes provision of an interpretation board situated adjacent to the Pen-Rhiw-Angharad Round Cairns Scheduled Monument. The Proposed Masterplan is appended at **Appendix EDP 2**.

Section 2 Legislation and Planning Guidance

- 2.1 This section sets out existing legislation and planning policy, governing the conservation and management of the historic environment, of relevance to this application.

LEGISLATION

- 2.2 In March 2016, the *Historic Environment (Wales) Act* came into force. Whilst providing a number of new provisions to existing legislation, the changes do not specifically affect the planning process, or the way archaeology and heritage is assessed.

Listed Buildings and Conservation Areas

- 2.3 The *Planning (Listed Buildings and Conservation Areas) Act 1990* is the primary legislative instrument addressing the treatment of listed buildings and conservation areas through the planning process in Wales.

- 2.4 Section 66(1) of the 1990 Act concerns listed buildings and states that:

“...in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

- 2.5 The ‘special regard’ duty of the 1990 Act has been tested in the Court of Appeal and confirmed to require that “*considerable importance and weight*” should be afforded by the decision maker to the desirability of preserving a listed building along with its setting. The relevant judgement is referenced as *Barnwell Manor Wind Energy Ltd v East Northants DC, English Heritage and National Trust (2014) EWCA Civ 137*.

- 2.6 However, it must be recognised that Section 66(1) of the 1990 Act does not identify that the local authority or the Secretary of State must preserve a listed building or its setting; and neither does it indicate that a development that does not preserve them is unacceptable and should therefore be refused.

- 2.7 This point is made very clearly in paragraph 54 of the judgement regarding *Forest of Dean DC v Secretary of State for Communities and Local Government (2013)*, which identifies that:

“...Section 66 (1) did not oblige the inspector to reject the proposal because he found it would cause some harm to the setting of the listed buildings. The duty is directed to ‘the desirability of preserving’ the setting of listed buildings. One sees there the basic purpose of the ‘special regard’ duty. It does not rule out acceptable change. It gives the decision-maker an extra task to perform, which is to judge whether the change proposed is acceptable. But it does not prescribe the outcome. It does not dictate the refusal of planning

permission if the proposed development is found likely to alter or even to harm the setting of a listed building.”

- 2.8 In other words, it is up to the decision maker (such as a local authority) to assess whether the proposal which is before them would result in “*acceptable change*”.

Archaeology

- 2.9 The *Ancient Monuments and Archaeological Areas Act 1979* addresses the designation and management of scheduled monuments, providing for the maintenance of a schedule of monuments (and archaeological remains), which are protected.
- 2.10 The designation of archaeological and historic sites as ‘scheduled monuments’ applies only to those that are deemed to be of national importance and is generally adopted only if it represents the best means of protection.
- 2.11 The 1979 Act does not address the concept of ‘setting’ for scheduled monuments; just their physical remains. Therefore, for scheduled monuments, the protection of ‘setting’ is a matter of policy only.
- 2.12 In Wales, the written consent of the Welsh Minister is required for development that would impact upon a scheduled monument, and applications for Scheduled Monument Consent are submitted to Cadw, the Welsh Government's Historic Environment Service.

NATIONAL PLANNING POLICY

- 2.13 The Welsh Government published *Future Wales: The National Plan 2040* on 24 February 2021 (WG 2021) and highlights in the foreword from the Minister for Housing and Local Government that it forms a “*framework for planning the change and development our country will need over the next two decades*”.
- 2.14 In terms of the Welsh Government’s objectives, Number 6 of ‘Future Wales Outcomes’ on page 55 states that:
- “Development plans will have a forward thinking, positive attitude towards enabling economic development, investment and innovation. Increased prosperity and productivity will be pursued across all parts of Wales, building on current activity and promoting a culture of innovation, social partnership, entrepreneurialism and skills-development in sustainable industries and sectors. The culture, heritage and environment of Wales will play a positive, modern role in the economy by attracting the interest and expenditure of tourists and providing a distinctive and trusted brand for Welsh businesses.”*
- 2.15 National planning guidance concerning the treatment of the historic environment across Wales is detailed in Section 6.1 of Chapter 6 *Distinctive and Natural Places of Planning Policy Wales Edition Twelve*, which was published on 07 February 2024 (PPW, 2024).
- 2.16 At paragraph 6.1.2, it identifies the historic environment as comprising individual historic features, such as archaeological sites, historic buildings and historic parks, gardens, townscapes and landscapes, collectively known as ‘historic assets’.

2.17 At paragraph 6.1.6, the Welsh Government’s objectives for the historic environment are outlined. Of these, the following are of relevance to the current assessment. These seek to:

“conserve archaeological remains, both for their own sake and for their role in education, leisure and the economy”; and ‘safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved’.

2.18 At paragraph 6.1.7, it is stated that:

“It is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way.”

2.19 As such, with regard to decision making, it is stated that: *“Any decisions made through the planning system must fully consider the impact on the historic environment and on the significance and heritage values of individual historic assets and their contribution to the character of place”.*

2.20 Regarding listed buildings, PPW (2024) states, at paragraph 6.1.10, that:

“...there should be a general presumption in favour of the preservation of a listed building and its setting, which might extend beyond its curtilage’ and then adds that ‘For any development proposal affecting a listed building or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building, or its setting, or any features of special architectural or historic interest which it possesses.”

2.21 It then adds that: *“The aim should be to find the best way to protect and enhance the special qualities of listed buildings, retaining them in sustainable use”.*

2.22 Regarding archaeological remains, PPW paragraph 6.1.23 notes that: *“The conservation of archaeological remains and their settings is a material consideration in determining a planning application, whether those remains are a scheduled monument or not”.* It then adds at paragraph 6.1.24 that:

“...Where nationally important archaeological remains are likely to be affected by proposed development, there should be a presumption in favour of their physical protection in situ. It will only be in exceptional circumstances that planning permission will be granted if development would result in a direct adverse impact on a scheduled monument (or an archaeological site shown to be of national importance).”

2.23 At paragraph 6.1.25 it states that:

“In cases involving less significant archaeological remains, 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.”

2.24 Paragraph 6.1.26 recommends that:

“...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. The needs of archaeology and development may be reconciled, and potential conflict very much reduced, through early discussion and assessment.”

2.25 In situations where planning approval would result in archaeological remains being lost or destroyed, at paragraph 6.1.27, PPW (2024) states the following in respect of the Local Planning Authority’s (LPA) obligations:

“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”.

TECHNICAL ADVICE NOTE 24

2.26 Additional heritage guidance in Wales is set out in Technical Advice Note 24: The Historic Environment (TAN 24) (Welsh Government, 2017).

2.27 TAN 24 sets out that it provides *“guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning applications”*.

2.28 It clarifies the policies and distinctions made in PPW (2024). A definition for a ‘historic asset’ is given as: *“An identifiable component of the historic environment. It may consist or be a combination of an archaeological site, a historic building or area, historic park and garden or a parcel of historic landscape. Nationally important historic assets will normally be designated”*.

2.29 Effects through changes within the setting of a designated historic asset are covered in TAN 24 at paragraphs 1.23 to 1.29. These paragraphs define the setting of an historic asset as comprising:

“...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 or negative contribution to the significance of an asset, may affect the ability to appreciate

that significance or may be neutral. Setting is not a historic asset in its own right but has value derived from how different elements may contribute to the significance of a historic asset.”

2.30 TAN 24 also identifies factors to consider when assessing effects on setting. Paragraph 1.26 requests that it is: “...for the applicant to provide the local planning authority with sufficient information to allow the assessment of their proposals in respect of scheduled monuments, listed buildings, conservation areas, registered historic parks and gardens, World Heritage Sites, or other sites of national importance and their settings”.

2.31 Paragraph 1.29 goes on to state that:

“The local planning authority will need to make its own assessment of the impact within the setting of a historic asset, having considered the responses received from consultees as part of this process. A judgement has to be made by the consenting authority, on a case-by-case basis, over whether a proposed development may be damaging to the setting of the historic asset, or may enhance or have a neutral impact on the setting by the removal of existing inappropriate development or land use.”

2.32 Also of relevance to the application is Section 4, which is concerned with archaeological remains. This section outlines advice regarding consultation, archaeological assessment and the preservation, recording and understanding of archaeological evidence.

LOCAL PLANNING POLICY

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

2.33 Relevant local planning policy is contained in the Local Development Plan (LDP), which was adopted by the Neath Port Talbot County Borough Council (NPTCBC) in January 2016.

2.34 Section 5.5 of the LDP outlines policies concerned with the treatment of the Historic and Cultural Environment.

2.35 This section contains the following policy relevant to this assessment:

“Strategic Policy SP21 Built Environment and Historic Heritage

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 importance; and*
4. *The identification of the following designated sites to enable their protection and where appropriate enhancement:*

- (a) *Landscapes of Historic Interest;*

- (b) *Historic Parks and Gardens;*
- (c) *Conservation Areas;*
- (d) *Scheduled Ancient Monuments; and*
- (e) *Listed Buildings and their curtilage.”*

Section 3

Methodology

ARCHAEOLOGICAL ASSESSMENT METHODOLOGY

- 3.1 This Archaeology and Heritage Assessment has been drafted in accordance with the Standard and Guidance for Historic Environment Desk-Based Assessment issued by the Chartered Institute for Archaeologists (CIfA 2020), with which EDP is a Registered Organisation (RO).
- 3.2 This report is written in accordance with a Written Scheme of Investigation (WSI) prepared by EDP in January 2024 (EDP, 2024) and approved in March 2024 by the Glamorgan Gwent Archaeological Trust (GGAT), acting as the archaeological advisor to the NPTCBC.
- 3.3 The assessment principally involved consultation of the available archaeological and historical information from documentary and cartographic sources. The major sources of information comprised the following:
- GGAT Historic Environment Record (HER), which holds information on known archaeological sites, monuments and finds, as well as previous archaeological investigations;
 - Cadw's Historic Environment Service for information on designated historic assets;
 - The National Monuments Record of Wales (NMRW), as held by the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW);
 - Historic maps held by online sources;
 - Recent and historic air photographs obtained from the Central Register of Aerial Photography for Wales (CRAPW) at Cardiff;
 - Environment Agency LiDAR datasets; and
 - A site walkover survey undertaken in January 2024.
- 3.4 This report provides a synthesis of relevant information for the Site derived from a search area extending up to 1km from its boundary, hereafter known as the 'study area', to allow for additional contextual information regarding the significance of designated assets and the contribution of their setting, as well the Site's archaeological interest or potential, to be gathered and understood.

3.5 The assessment of significance of known/recorded archaeological remains within the Site makes reference (where relevant) to the four 'heritage values' identified by Cadw within its Conservation Principles document (Cadw, 2011). These are:

- The asset's *evidential value*, which is defined as those elements of the historic asset that can provide evidence about past human activity, including its physical remains or historic fabric;
- The asset's *historical value*, which is defined as those elements of an asset which might illustrate a particular aspect of past life or might be associated with a notable family, person, event or movement;
- The asset's *aesthetic value*, which is defined as deriving from the way in which people draw sensory and intellectual stimulation from the historic asset; and
- The asset's *communal value*, which is defined as deriving from the meanings that a historic asset has for the people who relate to it, or for whom it figures in their collective experience or memory.

Setting of Heritage Assets

3.6 In addition to the potential for direct impacts on the fabric of an asset, when assessing the impact of proposals on historic assets, it is important to ascertain whether change within its 'setting' would lead to a loss of 'significance'. This assessment of potential indirect effects is made according to Cadw's guidance Setting of Historic Assets in Wales (published on 31 May 2017).

3.7 In simple terms, setting "*includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape*" (Cadw, 2017). It must be recognised from the outset that 'setting' is not a heritage asset and cannot itself be harmed. The guidance states that the importance of setting "*lies in what it contributes to the significance of a historic asset*".

3.8 As such, when assessing the indirect impact of proposals on heritage assets, it is not a question of whether their setting would be affected, but rather a question of whether change within the asset's 'setting' would lead to a loss of 'significance'.

3.9 Set within this context, where the objective is to determine the potential for development to have an adverse effect on heritage assets beyond the boundary of a development site, it is necessary to first define the significance of the asset in question - and the contribution made to that significance by its 'setting', in order to establish whether there would be a loss, and therefore harm. The guidance identifies that change within a heritage asset's setting need not necessarily cause harm to that asset - it can be positive, negative or neutral.

3.10 Cadw's guidance (Cadw, 2017) sets out a four-stage approach to the identification and assessment of setting effects; i.e.:

Stage 1: Identify the historic assets which might be affected;

Stage 2: Define and analyse the setting, to understand how it contributes to the asset's heritage significance;

Stage 3: Evaluate the potential impact of development; and

Stage 4: Consider options to mitigate or improve that potential impact.

3.11 Therefore, the key issue to be determined is whether, and to what extent, the proposed development would affect the contribution that setting makes to the heritage significance of the asset under consideration, as per Stage 2 of the Cadw guidance.

Setting Assessment Study Area

3.12 The Site is situated on high slopes in a semi-upland location. As described in **Section 1** it is partially wooded and there is considerable woodland in its immediate vicinity in all directions. This proliferation of trees encloses the areas of the Site that are proposed for development (see **Section 5** and the Proposed Masterplan at **Appendix EDP 2**).

3.13 Designated historic assets in the Site's wider vicinity are generally grouped into two geographical categories; scheduled monuments, which are preserved in high upland areas to the south-west, south and east of the Site, and listed buildings located within the settlements of the valley bottom of the Vale of Neath to the north, north-west and north-east.

3.14 For the upland areas, aside from hillsides to the south-west, which are in the immediate vicinity of the Site, land to the east and south is screened from the Site by rising topography and woodland. The land also rises at a point c.700m to the south-west of the Site partially screening the wider landscape beyond.

3.15 The valley bottom to the north is screened from the main part of the Site by deciduous woodland on the lower slopes and, beyond the adjacent parts of the valley, is further screened by topography as the valley curves. Furthermore, the valley bottom is in many places populated by buildings which frame the setting of both designated and non-designated built heritage assets, screening views and defining the character of their setting in an urban environment. Such areas are of a completely different character to the land at the Site and are detached from it in this regard.

3.16 As such, due to the topography and screening effect of woodland, coupled with the low height of the proposed chalets and their enclosure within woodland, it was deemed that a 1km study area is appropriate for assessing whether designated historic assets could be affected by the development as there is no experience of the wider historic landscape from the Site. This area is defined on **Plan EDP 1**.

Section 4 Existing Information

INTRODUCTION

- 4.1 The Site contains a single designated historic asset, the scheduled monument known as Pen-Rhiw-Angharad Round Cairns (**GM276**). The monument is located within the south-west corner of the Site, and its location and extent are depicted on **Plan EDP 1**. No other designated assets such as listed buildings, historic parks and gardens or conservation areas are located within the Site.
- 4.2 There are five designated historic assets within 1km of the site. These comprise two scheduled monuments and three Grade II listed buildings, which are discussed below and illustrated on **Plan EDP 1**.
- 4.3 As far as 'non-designated' assets are concerned, there are 10 records returned by the HER within the Site, and 8 records on the NMRW. Within the wider 1km study area there are 45 HER records, and 20 NMRW records.
- 4.4 With regard to previously recorded archaeological investigations or 'events', there is one recorded by the HER and this extends into the Site comprising a desk-based assessment for a wider area extending to the west for a proposed pipeline (**E002947**).
- 4.5 A further five event records are recorded within 1km of the Site; where relevant to the archaeological potential of the Site, these will be discussed within the period specific paragraphs below. The locations of all non-designated entries are identified on **Plan EDP 2**.
- 4.6 Extracts of historic cartographic sources and LiDAR Data, where relevant to the aims and objectives of this report, are included as **Plans EDP 3–5**.

DESIGNATED HISTORIC ASSETS

Scheduled Monuments

- 4.7 There is one scheduled monument located within the Site, Pen-Rhiw-Angharad Round Cairns (**GM276**), and two located within the study area, these comprise Blaen-Cwmbach Camp (**GM258**) and Blaen-Cwmbach Earthwork (**GM277**). Images that illustrate the Site and the historic assets within it and its vicinity can be found in **Appendix EDP 1**.
- 4.8 The significance, as well as the contribution of setting to the significance of the scheduled monuments will be considered individually below, as per Step 2 of the guidance outlined in Cadw's Setting of Historic Assets in Wales (2017).

Pen-Rhiw-Angharad Round Cairns

Significance

- 4.9 The monument (see **Plan EDP 6**) is recorded by Cadw (GM276) and the HER (two records **GGAT00687w** and **GGAT00611w**). The NMRW also returns four records (**307382**, **307384**, **307385** and **307391**) for cairns located within the scheduled monument area with a further four records just beyond its boundary to the east, which are part of the same group (**307386**, **307387**, **307389** and **307390**). All of these sources are referred to in this description as they all relate to either components of the monument or to cairns located outside of the monument boundary, but which are still part of the group and thus relate directly to its significance.
- 4.10 Cadw describe the monument as comprising the remains, both extant and buried, of a group of 8 prehistoric Round Cairns, with 8 recorded by the RCAHMW as individual records but with a possible 15 noted in their description of the group under record **307384**. Cadw also record a curving section of earthen bank, which is associated with the group. The HER distinguishes between a group of smaller cairns to the east (**GGAT00687w**) and a larger cairn (**GGAT00611w**) forming a mound to the west of the group, which is also recorded separately by the RCAHMW (**307384**).
- 4.11 In accordance with Cadw's description the cairns vary in diameter from 2m–12m and all comprise low mounds of small stones some of which incorporate larger slabs of stone.
- 4.12 The individual cairns are generally hard to see as they are situated within an area of dense young woodland (**Image EDP A1.1**) with dense understorey which screens the low-lying features. During the Site visit only two features of the group were readily identified, the larger cairn at the west end (**Image EDP A1.2**), which is defined by a distinct low mound and a small cairn that is located outside of the wooded area adjacent to a track which passes the monument to the south. A stone slab lying adjacent to the track may also represent a feature of the monument (**Image EDP A1.3**).
- 4.13 As well as the upstanding remains of the cairns the monument is very likely to also contain buried archaeological deposits. Whilst none of the records indicate that the monument has ever been accurately dated or mapped, given the form of the cairns the greatest likelihood is that the cairn field represents an area used for ritual activity or burial probably during the Bronze Age (c.2300–800 BC). In this period, many small-scale ritual or funerary monuments were established, often in prominent places in the landscape, such that the cairn group at Pen-Rhiw-Angharad fit this pattern.
- 4.14 As such, it is likely that the cairns are associated with buried deposits, including human burials.
- 4.15 Located within the monument at the end of a path cut through the understorey is a modern standing stone with an inscription commemorating the revival of the Pen-Rhiw-Angharad Uchaf estate by the Woodham family between 1984 and 2017.
- 4.16 The Cadw citation states that the monument was scheduled because it is:

“...of national importance for its potential to enhance our knowledge of prehistoric burial and ritual practices. The features are important relics of a prehistoric funerary and ritual landscape and retain significant archaeological potential, with a strong probability of the presence of both intact burial or ritual deposits and environmental and structural evidence.”

- 4.17 In this regard, the monument’s significance is primarily derived from its evidential value, which is contained in its extant physical remains and buried deposits. The monument also possesses historical value through its illustration of the nature of Bronze Age ritual and funerary practices and their relationship with the wider landscape.
- 4.18 Comprising low stone cairns which, aside from the examples described above, are largely screened by vegetation, the monument has very little visual presence in the landscape and thus possesses little or no aesthetic value. As a little-known monument of the Bronze Age that is hard to experience, the monument also possesses little or no communal value.

The Contribution of the Monument’s Setting to its Significance

- 4.19 Whilst the majority of the monument’s significance is contained in its physical fabric a lesser proportion is derived from its setting.
- 4.20 As noted above the monument is located within a small area of woodland (**Image EDP A1.1**) defined by young deciduous trees but with a dense understorey. This vegetation covers almost the whole monument with only the cairn (**307391**) located at the side of the adjacent track to the south not within it. The undergrowth obscures any visual appreciation of most of the cairns due to their low height and by restricting access through the monument on foot.
- 4.21 Whilst this restriction of access may protect the monument, the cairns are susceptible to damage from tree roots. Furthermore, the screening effect greatly reduces the degree to which the monument can be seen and understood. As such, the vegetation that covers the monument is a negative aspect of its setting that detracts from its significance to a low degree.
- 4.22 Beyond the woodland, the monument is set within a grassed field populated by occasional ornamental trees, which is crossed by a track (**Image EDP A1.4**) running roughly east to west. This track forms part of the alignment of the Cefn Ffordd (**GGAT00374.0w**), a ridge-top route between Neath and Merthyr that is of at least 18th century date and is speculated by GGAT as a possible Roman Road, on the basis that it passes through the Blaen-Cwmbach Camp.
- 4.23 The field is part of the Pen-Rhiw-Angharad Uchaf estate and at its western end the track is framed by stone piers (**Image EDP A1.5**). At its eastern end the track passes between stone walls (**Image EDP A1.6**) before leaving the estate and entering the Pelenna Forest. Just to the east of the monument is a modern structure used for storage as well as a row of beehives. To the north of the woodland and the scheduled monument is a grassed strip, which comprises the route of a gas pipeline.
- 4.24 Evidently the appearance of the field in which the monument lies is largely defined by its modern landscaping, with modern ornamental planting, open spaces and structures.

However, the openness of the area does allow for an appreciation of the monument's more visible aspects, such as the mound at the western end and the cairn located outside of the vegetation as well as for views out to the wider landscape. None of the modern structures present obscure any appreciation of the monument. As such, the immediate field in which the monument is situated is a positive aspect of its setting that contributes to a low degree to its significance.

- 4.25 Further to the west and south are extensive grassed fields used for upland pastoral farming, with coniferous woodland to the north and east. On account of the monument being on a slight rise, the openness of the fields to the west and south allows for broad views across the landscape (**Images EDP A1.5 and A1.7**) allowing the cairn field's situation located at the crest of a ridge to be appreciated. It is also possible to look west to the remains of another Bronze Age barrow, Cefn Morfudd North 3 (**GGAT00610w**) located c.160m to the south-west. In this regard the openness of the landscape to the west and south is a positive aspect of the monument's setting that contributes to a low degree to its significance.
- 4.26 The cairn group is one of numerous barrow-type monuments, attributed to the Bronze Age that lie along the ridge mainly to the east. The HER states that in 1936, a Lady Fox recorded at least 36 cairns, presumably within the general locality of the ridge and probably including those at Pen-Rhiw Angharad. Whilst six barrow-type features are recorded by the GGAT HER (i.e. **00688w, 04046w-04049w**) these are all to the east of the monument and so cannot be seen from it due to the presence of Pelenna Forest.
- 4.27 As such, an aspect of the monument's setting that contributes positively to its significance is its association with other broadly contemporary monuments located along the ridge. Notwithstanding the view to Cefn Morfudd North 3, this association, presently cannot be experienced visually, however, a spatial appreciation of the presence of the monuments allows for an understanding that this ridge was evidently of some importance in the Bronze Age, possibly representing a liminal area, between the settled valleys, associated with the burial of the dead or other ritual activity. As such, the topographic situation of the monument at the crest of the ridge as well as the group association with other contemporary archaeological features along it, are aspects of the setting of the scheduled monument that make a moderate and positive contribution to its significance.

The Contribution of the Wider Site to the Monument's Significance

- 4.28 As described above, although the trees and other vegetation that shroud the cairns are a negative aspect of their setting, the wider field allows for views across it either out to the wider landscape, whereby the monument's topographic situation can be appreciated or in views to the parts of the monument that are visible. The wider site extends to the north where its further extents are separated from the field by coniferous woodland. This woodland serves to screen any views out to other parts of the Site from the scheduled monument and, likewise, screens any views to the monument from other parts of the Site (**Image EDP A1.8**).
- 4.29 Should this woodland be felled through commercial forestry operations such views would open up, however, as set out in **Section 5** the proposed development would result in its retention and the maintenance of its screening effect.

- 4.30 Aside from probable contemporary cairns located to the east in dense woodland (**00688w**), which have been discussed above, there are no known archaeological features within the wider site that have any association with the Bronze Age cairns at the monument.
- 4.31 As such, given the screening between the monument and the wider site to the north by coniferous trees and the lack of any associative features that might relate spatially to the significance of the cairns, the wider site, beyond the immediate field in which the cairns lie does not represent a part of its setting and makes no contribution to its significance.

Blaen-Cwmbach Camp

Significance

- 4.32 The monument (c.80m to the south of the Site) is recorded by Cadw (**GM258**) as the remains of a Roman marching camp, surviving as a slight earthen bank (**Image EDP A1.9**), which formed its perimeter, and which is best preserved on its western and south-western sides (**Image EDP A1.10**). An original entrance is notable to the west, which includes the remains of an external bank and ditch or *tutulus*.
- 4.33 Cadw and the GGAT HER also record several archaeological features within the camp, which may or may not have been related to it or may have been related to its siting. The most notable is the earthwork enclosure Blaen-Cwmbach Earthwork (**GM277**), which is defined as a separate scheduled monument and is thought by Cadw to represent the remains of an earlier, small Iron Age ringwork, possibly unfinished.
- 4.34 GGAT also record an embanked enclosure (**GGAT06002w**) of unknown provenance, and a house platform (**GGAT00617w**) set on the rampart within the bounds of the camp.
- 4.35 These other archaeological features located within the former camp are all probably associated to a degree and thus contribute to the significance of each other to a moderate degree.
- 4.36 The camp was partially excavated in 1974 (**GGATE0449**), which identified a stone and clay inner revetment to the rampart as well as evidence for burning and stonework.
- 4.37 The Cadw citation states that the monument was scheduled because it is:
- “...of national importance for its potential to enhance our knowledge of Roman military organisation. The monument forms an important element within the wider context of the Roman occupation of Wales and the structure itself may be expected to contain archaeological information concerning chronology and building techniques, together with a strong probability of environmental evidence.”*
- 4.38 In this regard, the monument’s significance is primarily derived from its evidential value, which is contained in its extant physical remains and buried deposits. The monument also possesses a degree of historical value such that Cadw associate it with the campaigns of Sextus Julius Frontinus during AD 73–78. In a general sense its presence illustrates the nature and methodology of the Roman occupation of Britain.

- 4.39 Comprising partial ramparts, which are low in height, the monument has very little visual presence in the landscape and thus possesses only a low degree of aesthetic value. As a little-known monument of the Roman era, that is hard to experience, situated high in an upland landscape, the monument also possesses little or no communal value.

The Contribution of the Monument's Setting to its Significance

- 4.40 The monument is set within a landscape of broad, grassed fields divided by banks and post and wire fences that are used for pastoral farming (**Image EDP A1.11**). The remains of the monument, where preserved, comprise low-lying earthworks (**Image EDP A1.9**), which are best appreciated from adjacent areas or from the air.
- 4.41 Whilst the nature of this landscape is of little relevance to the function of the camp, its openness allows for an appreciation of the earthwork remains as well as for broad views out across the wider landscape in all directions. Such views allow for an appreciation of the topographic situation in which the monument was built and of the reasoning behind its position. It can be seen that the camp was intended to have a strong presence in the landscape, to control traffic along the ridge-top route, to dominate the adjacent valleys and encompass an old hillfort and maybe even occupy an area of sacred importance to the local population, such that the ridgeline in the area is populated by cairns.
- 4.42 This topographic aspect and the ability to appreciate it on account of the openness of the landscape in which the monument lies, is an aspect of its setting that makes a moderate positive contribution to its significance.
- 4.43 The monument probably also has an association with the road, the Cefn Ffordd (**GGAT00374.0w**), which passes through it, and which may have evolved from an ancient ridge-top route into a Roman Road. In this regard the track is also part of the monument's setting that makes a low positive contribution to its significance.

The Contribution of the Site to the Monument's Significance

- 4.44 The Site (located c.80m from the camp at its nearest point) is largely screened from the monument by the coniferous woodland at its south-west corner. There are views to the south-western corner of the site and to the location of the scheduled monument Pen-Rhiw-Angharad Round Cairns. As noted above it may be that the camp was established to dominate an area that was of importance to local people because of the cairns and so there is possibly an historical association between the two monuments, albeit fairly tenuous. Consequently, the monument in the Site is part of the setting of the camp and makes a low positive contribution to its significance.
- 4.45 The majority of the Site, further to the north-east is entirely screened from the monument and there are no views to the monument from it. Furthermore, it contains no known archaeological features that have any association with it. As such, the wider parts of the Site beyond the trees are not part of the setting of the scheduled Roman camp and make no contribution to its significance.

Blaen-Cwmbach Earthwork

Significance

- 4.46 The monument (**Image EDP A1.12**): c.630m west of the Site) is recorded by Cadw as a small earthwork enclosure (**GM277**) situated within the Roman marching camp. The enclosure, situated at a high point of the ridge, is defined by an earth and stone bank c.9m wide and c.1.5m high, which utilises a steep natural scarp to the north as part of its circuit. The south-eastern side has an external ditch and causewayed entrance.
- 4.47 Cadw speculate that the enclosure pre-dates the Roman camp and is probably of the Iron Age period, possibly being unfinished or slighted such that the ditch has possibly been infilled. It is also recorded by GGAT (**GGAT00615w**) and the RCAHMW (**307217**) who both provide further detail on the monument with the RCAHMW speculating that it may be related to the Roman camp.
- 4.48 The Cadw citation states that the monument was scheduled because it is:
- “...of national importance for its potential to enhance our knowledge of later prehistoric defensive organisation and settlement. The site forms an important element within the wider later prehistoric context and within the surrounding landscape. Its significance is further enhanced by its location within the later Roman encampment.”*
- 4.49 In this regard, the monument’s significance is primarily derived from its evidential value, which is contained in its extant physical remains and buried deposits. The monument also possesses a degree of historical value such that it may be related to the later Roman camp or was deliberately contained within it or damaged by the Romans.
- 4.50 Comprising ramparts which are low in height and a ditch, the monument is not especially prominent although its location at the top of the rise lends it some presence, as such, it has a low degree of aesthetic value. As a little-known monument situated high in an upland landscape, the feature possesses little or no communal value.

The Contribution of the Monument’s Setting to its Significance

- 4.51 Like the surrounding Roman camp, the monument is set within a landscape of broad, grassed fields divided by banks and post and wire fences that are used for pastoral farming (**Image EDP A1.11**). The remains of the monument, where preserved, comprise low-lying earthworks (**Image EDP A1.12**), which are best appreciated from adjacent areas or from the air but which on account of their location at the top of a rise can be seen from further afield.
- 4.52 Whilst the modern farming aspect of this landscape is of little relevance to the function of the camp, its openness allows for an appreciation of the earthwork remains as well as for broad views out across the wider landscape in all directions. Such views allow for an appreciation of the topographic situation in which the monument was built and of the reasoning behind its position such that it is likely that its location was chosen for defensive purposes or to be seen from afar as a symbol of status.

- 4.53 This topographic aspect and the ability to appreciate it on account of the openness of the landscape in which the monument lies is an aspect of its setting that makes a moderate positive contribution to its significance.
- 4.54 The monument is speculated to be of the Iron Age period. There are no known Iron Age features in its vicinity although it may have been intended to possess some sort of relationship with the barrow cemetery further to the east and probably also with the route along the ridge top, which it may have controlled. As such, the barrows to the east and track that runs past the monument, and which represents the modern form of this route are elements of its setting that make a low but positive contribution to its significance.

The Contribution of the Site to the Monument's Significance

- 4.55 The Site is fairly distant from the monument, located c.630m to the east. Most of the Site is screened from the monument by the coniferous woodland in the south-west part of the Site and by the landfall to the north.
- 4.56 As for the Roman camp there are views from the monument to the south-west corner of the Site and the Pen-Rhiw-Angharad Round Cairns and there may have been some intended intervisibility between the enclosure and the cairns, which is still just about appreciable in a distant view. In this regard, the cairns and the openness of the south-west corner of the Site, which allows for this view, are elements of the setting of the monument that make a low positive contribution to its significance.
- 4.57 Otherwise, the rest of the Site further to the north-east is entirely screened from the monument and there are no views to the monument from it. Furthermore, it contains no known archaeological features that have any association with it. As such, the wider parts of the Site beyond the trees are not part of the setting of the scheduled enclosure and make no contribution to its significance.

Listed Buildings

- 4.58 There are three Grade II listed buildings that fall within the 1km study area, all of which are located to the north of the Site (see **Plan EDP 1**). These buildings comprise the following:
- Bridge over Neath Canal south-west of Ynys Nedd Farm (**22873**), located c.100m north of the Site's proposed access route;
 - Twrch Brook culvert and overflow sluice on the Neath Canal (**82289**), located c.540m north-east of the Site; and
 - Milestone on B4242, 100m east of Rock and Fountain Public House (**87862**), located c.760m north of the Site.
- 4.59 All of these heritage assets are relatively small structures. Two of them relate directly to the Neath Canal and its function, the canal being a key element of their setting that contributes highly to their significance. The milestone is a diminutive feature located at the roadside. In this regard their significance is largely derived from their historical value representing features related to the history of transport and its infrastructure in the Neath Valley.

- 4.60 The setting of these assets, in so much as it contributes to their significance, is defined by their experience within their immediate locations either at the canal side or roadside, which provide a visual appreciation of their function and functional relationships.
- 4.61 The landscape beyond their immediate surroundings has little relevance to their significance beyond its openness allowing for a visual appreciation of the assets. In this regard, land beyond their immediate vicinity which is screened from the assets, such as distant agricultural land, grassland or woodland makes no contribution to their significance.
- 4.62 All of these designated assets are entirely screened from the Site by intervening vegetation, most profoundly by the trees that line the canal, the adjacent railway and the B4434 road (**Image EDP A1.13**), which block all views to the canal side from the south. The canal culvert and sluice can be experienced from the adjacent roadside (**Image EDP A1.14**), but to the south, in the direction of the Site the view is blocked by trees. Further wooded slopes lie between the main part of the Site and the valley bottom.
- 4.63 The proposed entrance to the Site is located relatively close to the canal bridge (c.100m) but is entirely screened from it by trees at the roadside, and the canal itself cannot be seen. As such, the entrance road will have no presence in the setting of the bridge and will not affect its significance.
- 4.64 Consequently, the Site does not represent a part of the setting of any of these assets and makes no contribution to their significance. Development within the Site would therefore not cause harm to the significance of these assets through change to their setting and they are not considered any further in this assessment.

NON-DESIGNATED HISTORIC ASSETS

Archaeology

Prehistoric (c.500,000 BC–AD 43)

- 4.65 There are three records dating from the prehistoric periods on the HER and eight on the NMRW within the Site boundary. Within the 1km study area, a further eight HER and five NMRW records are recorded.
- 4.66 Within the Site, two of the HER records are located at the south-west corner of the Site within the extent of the scheduled monument Pen-Rhiw Angharad Round Cairns (**GM276**). All of the eight NMRW records (**307382**, **307384–307387** and **307389–307391**) also relate to the scheduled cairn group, although only four are actually within the scheduled area with the other almost immediately adjacent, such that they contribute highly to its significance. As discussed above, these records document the remains of a cairn group of unknown age, but which probably dates from the Bronze Age and which form part of a wider, dispersed cairn group set out along the ridge top to the south, south-west and south-east of the Site.
- 4.67 Further to the east, near the southern boundary of the Site, as also mentioned above, a second grouping of Bronze Age cairns is recorded (**00688w**). This comprises a group of three circular mounds recorded by the HER as measuring between 4m and 6m in diameter

and approximately 0.6m high; all three are noted as being disturbed and are overgrown with grass and tree growth. Due to dense tree and understorey cover it was not possible to locate these cairns during the Site visit and it seems likely that they have been damaged by forestry works.

- 4.68 Within the study area there are five additional cairns recorded by the HER, each located to the south of the Site; elements of the wider dispersed cairn group. These records comprise the Gwenffrwd Cairns I to IV (**04046w–04049w**), located c.50m to 200m south of the Site. The HER notes that whilst these cairns are depicted on the 1st edition Ordnance Survey map, no cairns were found at this location during a site visit by GGAT in 1998. This is deemed by the HER likely indicative of later land management having levelled the cairns.
- 4.69 The final two records relate to earthworks that probably date to the Iron Age period. Record **00615w**, located c.650m south-west of the Site relates to the earthwork forming a univallate enclosure, which is designated as scheduled monument Blaen-Cwmbach Earthwork (**GM277**) and discussed in full above. Record **00689w**, located c.800m east of the Site relates to earthworks indicative of an Iron Age defended enclosure, although the HER notes that no evidence of such earthworks was seen on the ground during a field visit by GGAT.
- 4.70 Based on the evidence above, there is a moderate potential for the Site to contain archaeological remains dating to the prehistoric period beyond the extent of the known scheduled monument located within the Site and its closely associated adjacent cairns (discussed in full above). Given the presence of the known cairn group along the ridge, it is most likely that features would comprise additional funerary cairns or related features (both buried and extant) located close to the Site's southern edge on its highest slopes (as suggested by record **00688w**). Whilst features of this nature could be of moderate or even high evidential value, due to later forestry activity they most likely would survive only as poorly preserved buried remains.
- 4.71 There is more limited potential for features of later prehistoric periods. The probable Iron Age enclosures along the ridge suggest settlement or some form of landscape control in the locality, possibly focussed on a ridgeway route. However, the steep slopes and upland nature of the Site does not suggest that it would have been used for agriculture or settlement and so the likelihood for buried features of the later prehistoric era occurring within the Site is low. Such features, if present would likely comprise poorly preserved, low value buried remains, such as infilled ditches or pits.

Romano-British (AD 43–410)

- 4.72 There is one HER record tentatively dated to the Roman period within the Site and no records on the NMRW. Within the 1km study area defined around the Site, only one record relates to the Romano-British period in the HER and only one in the NMRW data.
- 4.73 The record within the Site has been discussed above as it relates to the ridge-top track which passes through the Blaen-Cwmbach Roman marching camp and east/north-east towards Merthyr Tydfil (**00374.0w**). The HER notes that this road is predominantly of post-medieval date, having been used until at least the late 18th century as the ridge path between Neath and Merthyr. However, the HER notes the possibility that this may reflect an

earlier Roman Road alignment, or more general ridge-top route. Nevertheless, the HER states that there is no known archaeological evidence for a Roman road in this location.

- 4.74 Approximately 85m to the south-west of the Site lies the scheduled monument Blaen-Cwmbach Camp (**GM258**), this Roman marching camp is recorded by the HER as **00616w** and the NMRW (**301344**) and discussed in full above.
- 4.75 The Roman evidence within the study area suggests an ephemeral Roman presence in the locality during the period in which the land later known as Wales was a military frontier. Whilst the Roman camp is evident, it is likely that it was built to temporarily control the adjacent valleys and probably a ridge-top route, and there is no evidence it was occupied beyond a temporary duration or that the locality then became settled.
- 4.76 As in the prehistoric section above, the Site itself, with its steep, upper slopes, is unlikely to have represented good land for settlement and the likelihood of Roman era archaeological remains occurring within it is low. Such features, if present, would likely comprise poorly preserved, low value buried remains, such as infilled ditches, pits or isolated finds.

Early Medieval – Medieval (AD 410–1540)

- 4.77 There are no early medieval or medieval records identified on the HER within the Site, and just one record dating from the medieval period within the 1km radius study area. There are no medieval records in the NMRW in the Site or study area.
- 4.78 This record comprises a curved field boundary, with stone facing, of possible medieval or early post medieval date, located c.250m west of the Site (**04629w**). This record indicates that the local landscape was being managed during the medieval period probably for pastoral farming.
- 4.79 Located on upper slopes above the Vale of Neath, it is unlikely that the Site was settled, and the Site probably comprised areas of woodland or rough grassland used for grazing, along with limited agricultural fields during the early medieval and medieval periods.
- 4.80 As common grazing land or woodland, it is unlikely that the Site would contain any features or deposits related to medieval activity and any features related to small scale agricultural management, such as buried plough soils or infilled boundary ditches, would be of no greater than very low archaeological interest. As such, the Site is considered to have very low potential to contain archaeological features, deposits and/or remains from the early medieval or medieval periods.

Post-medieval to Modern (AD 1540–Present)

- 4.81 The majority of the records held by the HER relate to the post-medieval to modern periods, including 4 records located within the Site, and a further 35 located within the study area. Fourteen of the NMRW records within the study area relate to the post-medieval period.
- 4.82 These records primarily relate to the industrial development of the landscape for coal mining from the 18th century onwards. Within the Site, these records are mainly located at its northern end. This includes the remains of Cefn Mawr Colliery (**07260w**), associated with an incline tramway (**07753w**) that runs north downslope into the valley. Whilst the HER

- notes that the colliery is visible from the First Edition OS map of 1884 (see **Plan EDP 4**), a review of historic mapping established that Colliery and the tramway are not named as such until the 1921 edition OS map (see **Plan EDP 4**).
- 4.83 Mining activity is apparent at this location on the 1884 map, with a spoil heap and tramway running on a gradual downslope to the west towards the Neath Valley railway line. The 1964 Ordnance Survey map (see **Plan EDP 4**) still labels the colliery as a working mine although by 1973 the mine is marked as disused (**Plan EDP 4**).
- 4.84 The site of the colliery is now located within dense woodland and its remaining earthworks and other structures are better understood through LiDAR analysis than on the ground (discussed below). No evidence of structural remains related to the colliery were seen during the site visit, (**Image EDP A1.15**) with the impression only of an open space with former mine entrance against the hillslope to the south and spoil tips to the north. Due to woodland, it was not possible to see the course of the former incline tramway.
- 4.85 With structures, equipment and buildings probably salvaged when the mine closed, remains related to the colliery are limited to buried structural remains, such as foundations, and earthworks relating to the former tramway and the fairly substantial spoil heaps. These limited physical remains have a low degree of evidential value but do possess a slightly higher degree of illustrative historic value, illustrating the 19th and 20th century industrial history of the local landscape.
- 4.86 Two coal levels (**07280w** and **07281w**) are also recorded within the Site, these are labelled on the Third Edition of the OS map of 1921 as 'old coal level', and earthworks in these locations are visible on the Second Edition OS map of 1900 (not illustrated) and the easternmost is just about visible on the OS map of 1884. This suggests that the coal levels probably date from the late 19th century, contemporary with the earlier phase at Cefn Mawr Colliery but went out of use in the early 20th century probably superseded by the colliery, which, located at the same elevation on the hillside probably mined the seams of coal.
- 4.87 The two levels are connected by a track (**Image EDP A1.16**) that runs from east–west along the contour with several offshoots. This evidently originated as tramway, or series of tramways, running between the mine entrances, which historic maps indicate joined up with the Vale of Neath and Cefn Mawr Junction Railway further to the east and to that at Cefn Mawr Colliery to the west. The later maps suggest that the tramway from Cefn Mawr may have superseded the railway to the east, which maps indicate went out of use in the early 20th century.
- 4.88 As noted on the LiDAR data and glimpsed during the Site visit, there is earthwork evidence along this east–west route for multiple cuts into the hillside and small spoil tips suggesting maybe a period of prospection or small-scale mining off the route or off adjacent routes. During the Site visit, the entrance to the level at **07281w** was seen, which is now infilled. That to **07280w** was not, however, evident, possibly having been entirely buried.
- 4.89 As for the mining remains at Cefn Mawr Colliery the earthwork remnants of mining within the Site possess very limited evidential value and a slightly higher low degree of historical value such that they illustrate the process of coal mining that occurred on the hillside in the 19th and 20th centuries.

- 4.90 The final record within the Site relates to a well, located near the Cefn Mawr Colliery (**07092w**). The well is visible from the First Edition OS map of 1884 but is no longer depicted by the 1921 edition. No structural remains related to the well were seen during the Site visit, however, the buried elements of the well may survive with a similar low degree of significance to the nearby industrial earthworks.
- 4.91 Within the study area, the HER records primarily relate to either the agricultural development of the area during this time, as per five 19th century farmsteads identified as part of GGAT and Cadw's Historic Farmsteads project – Cefn-y-gelli Farmstead (**9622w**), Clyne Farmstead (**09623w**), Ystratt Owen Farmstead (**09627w**) and Blaen-Trwch Farmstead (**04335w**), and Blaen Cwm Bach Farm (**03657w**) the closest of which is located c.400m south from the Site.
- 4.92 None of these buildings has an historical or functional association with the land at the Site and all are well separated from and screened from the Site by intervening woodland. As such, the Site's development would not adversely affect their settings such that they represent low value historic assets.
- 4.93 Further industrial features are largely located to the north, east and south of the Site, and are likely related to wider industry around the Resolven Tin Plate Works (**08966w**). Located c.675m north of the Site functioned between 1879 and 1946, before being almost entirely demolished.
- 4.94 Several coal levels, likely associated with the tin works, are recorded to the east of the Site (**07327w**, **06381w** and **06382w**), the closest being c.625m from the Site boundary, and are noted on late 19th or early 20th century mapping. A coal pit, seen on early 20th century mapping is also located c.850m east of the Site (**04462w**).
- 4.95 Approximately 350m south-east of the Site lies a grouping of features including a quarry (**04460w**), a winding drum (**04050w**), an enclosure (**04461w**) and a structure of unclear purpose are all recorded on early 20th century mapping (**04334w**).
- 4.96 Several tramways associated with this industrial development are also recorded (**04458w**, **04459w**, **07755w**, **07328w** and **07753w**), each seen on late 19th or early 20th century mapping. None of these tramways extend into the Site and the closest is located c.600m to the south-east. The Vale of Neath railway line, which operated between 1863 and 1985, is also recorded immediately north of the Site (**02500.0m**).
- 4.97 Further evidence of the developing transport system, as a result of the industrialisation of the area is seen through the Neath canal, located c.100m north of the Site (**01027.0w**) and its associated features, such as an aqueduct (**07329w**), lock (**09027w**), lock overbridge (**01027.21w**) and sluice gate (**05296w**), the closest of which is located c.425m west of the Site.
- 4.98 The remaining records of this date relate to a number of boundary stones are also recorded to the south-east of the Site, approximately 350m from its boundary at closest, which appear to demarcate the Parish boundary at this time (**04051w-04052w** and **04057w-04066w**). No such features are recorded within the Site.

- 4.99 From the information above, and an assessment of historic mapping (see cartographic sources section below), it is most likely that the Site was enclosed from open or semi-wooded land during the post-medieval period, to then be utilised for grazing or as forestry on the upland margin prior to its industrial usage for coal mining. Earthwork and buried features exist within the Site that relate to 19th and 20th century industrial activity, which are assessed as at most as historic assets of low significance.
- 4.100 There is also potential for buried remains related to agricultural practices through the post-medieval to modern periods, notably at the centre of the Site on the more level and cleared ground. Any such remains would likely relate to buried plough soils or former field boundaries and be of no greater than negligible heritage value.

CARTOGRAPHIC SOURCES

- 4.101 The earliest known map to depict the Site is the 1846 Tithe Map of the Hamlet of Llantwit Lower, in the parish of Llantwit juxta Neath (**Plan EDP 3**).
- 4.102 On the 1846 map, the Site is depicted as being divided into a number of fields. These fields are varied and largely irregular in shape, with curved boundaries suggesting haphazard enclosure possibly where land was taken from woodland or waste through occasional assarting as fields were enclosed and improved possibly from as early as the medieval period. A single farmstead, named Pen-Rhiw Angharad Uchaf, is illustrated within these fields, which now comprises the basis for a modern dwelling.
- 4.103 The apportionment describes these fields as belonging to a Mr Henry John Grant and being occupied by a Mr David Howell. The central fields (Plots 96, 97, 99, 101) are recorded as being under arable and pastoral use. Plot 98 is recorded as woodland, and the remaining plots are recorded meadow and pasture, suggesting these areas were rough grassland, or semi-wooded land used for grazing. Indeed, Plot 100 is named 'coedcae', roughly translating as 'field of trees', suggesting it was probably under similar forestry use as it is at present. There are no industrial features depicted on the Tithe map.
- 4.104 Later depictions of the Site are on historic Ordnance Survey Maps of the late 19th century and 20th century. The First Edition Map of 1884 (**Plan EDP 4**) is the next available map source after the Tithe Map to show the Site, and it details few changes within it. This map shows the same boundaries as seen on the Tithe map, although with an amalgamation at the north-east corner, where the woodland of Plot 98 now covers the entire north-east corner of the Site. The majority of the Site is illustrated as rough grassland or moorland, as indicated from the Tithe map, while the central area around the farmstead is shown as agricultural land, with a well labelled near the farm. As described above, the industrial usage of the Site is first evident on this map.
- 4.105 The 1900 Second Edition OS map (not reproduced) shows only very minor changes from the map of 1884. As described previously, the two coal levels are shown with a tramway running east-west across the Site. By the 1921 Third Edition OS map (**Plan EDP 4**), these spoil heaps are labelled as 'old coal levels' suggesting the levels were exhausted by then but with mining in the locality continuing at the colliery, which is shown as comprising a

group of three buildings with a level behind them into the hillside, a large spoil heap extending to the north, along with the incline tramway extending to the north.

- 4.106 The 1938 OS map (not reproduced) shows no changes besides an air valve and sluice valve being marked immediately north-east of the colliery. By the 1964 OS map, the colliery buildings are no longer shown although the Site is still marked as a 'mine' with a level to the south. By 1973, the mine and its associated tramway to the north are both marked as 'disused', and the level is no longer labelled.
- 4.107 Mapping from the early 21st century shows no further changes, although they indicate that the farmstead at Pen-Rhiw Angharad Uchaf was rebuilt as a new dwelling.
- 4.108 Historic maps demonstrate that the Site contains field and forest boundaries that date from at least the mid-19th century, and had remained as woodland and rough grassland since this time with fields of pasture adjacent to the farmstead. The upper slopes have evidently been adopted for forestry use in more recent times.
- 4.109 The maps illustrate the Site's industrial use from the late 19th century onwards, with coal mining via levels from at least the late 19th century apparent around the 200–220m contour along the hillside, culminating in the early 20th century development of a colliery in the western part of the Site. Some of the tramways which connected the mines with infrastructure to the east of the Site are still extant as paths, with others heavily overgrown.

AERIAL PHOTOGRAPHS

- 4.110 A total of 45 vertical aerial photographs, covering the Site and its immediate environs, were identified within the collection maintained by the Welsh Government's CRAPW. None of the photographs are reproduced here due to copyright restrictions.
- 4.111 The available images span the period from 1945 to 1992 and confirm the agricultural land use and development sequence shown on the historic maps.
- 4.112 The aerial photographs from 1945 depict the Site as a mixture of rough grassland and semi-wooded land, with agricultural land at the centre, around the farmstead, with the boundaries matching those recorded on historic mapping. No buildings related to the Cefn Mawr Colliery are visible, although a large spoil heap is present immediately to the north, as seen on historic mapping, and two smaller heaps to the south are visible. The line of the tramway running to the north is also visible as a raised trackway, although it is evidently out of use and largely overgrown. None of the spoil heaps at the former coal levels are visible, due to woodland.
- 4.113 Images from the 1960s show a similar scenario at the Site. Managed forestry is evident, with much of the woodland at the north-east of the Site cleared, and with new rows of trees evident in many areas which are now forested. By 1972, the north-eastern, south-eastern and western parts of the Site are shown populated by trees. This remains the case throughout the remaining photographs and is the situation on the Site at present.
- 4.114 No cropmarks or earthworks are visible on the aerial photographs that may potentially indicate the presence of unrecorded buried archaeological remains within the Site, although

the photographs indicate spoil heaps at the north-west of the Site associated with the former Cefn Mawr Colliery, as discussed above.

LIDAR DATA

- 4.115 Airborne LiDAR data (light detection and ranging) was utilised as a source of primary data for the current assessment. LiDAR scanning records height data and has applications in the recording of archaeological earthworks.
- 4.116 A Digital Terrain Model (DTM) for the Site was acquired from the Environment Agency Data available on-line. Resolution of the data is at one data point for each 1m², a low resolution which, for archaeological prospection, has fairly limited application, aside from in the identification of larger earthworks.
- 4.117 The DTM was processed using the Relief Visualisation Toolbox (ver. 1.3 ZRC SAZU, 2016). This software allows for a range of visualisation techniques to be applied to the data. Different techniques have varying degrees of successful application, depending on the nature of the environment where the data was collected. As such, the whole suite of visualisations was produced and then, the individual images appraised as to their usefulness in the current context. This appraisal identified that of the visualisation techniques Multiple Direction Hill-shades produced the best quality and most useful imagery for the archaeology assessment.
- 4.118 This technique was used to produce useful images for the assessment providing an additional source of data on the Site's archaeological potential, and which was used for guiding the walkover survey. These images are reproduced as **Plan EDP 5** (annotated with reference to the text below).
- 4.119 The LiDAR imagery was not especially effective at identifying the extant prehistoric cairns both in the location of the scheduled monument Pen-Rhiw-Angharad Round Cairns, and in the woodland in the southern part of the Site, as indicated by the HER (**00688w**). The larger cairn in the western part of the scheduled monument is visible as an expression but other features are not, suggesting most likely that they are too small to be accurately surveyed or are obscured by undergrowth.
- 4.120 The LiDAR imagery does provide a very good source of information on the Site's industrial exploitation and infrastructure. It clearly shows the spoil heaps around the former site of the Cefn Mawr Colliery (**A**), as well as the raised trackway of the former incline tramway (**B**) which runs to the north. The imagery shows a complex of tracks, former tramroads and levelled spaces at the mine. In this regard, it provides a much better record of the remnants of the mine than can be seen on the ground such that the whole area is shrouded by dense woodland.
- 4.121 Further to the east, as noted above, numerous small depressions (**C**) are depicted in a linear form adjacent to a series of former tramroads. These are probably associated with the two known level entrances in this area (**Image EDP A1.17**) and may represent some form of mining technique, possibly extraction along an exposed seam or though shallow workings that have collapsed or, possibly prospection, by digging test levels leading to the delving of

the two more substantial entrances (one of which is extant). Whilst this area is shrouded in vegetation some of these depressions could be seen from the adjacent track (**Image EDP A1.18**).

- 4.122 Elsewhere across the Site, a number of footpaths are seen traversing the Site, as seen on historic mapping, as are field boundaries.
- 4.123 The only other features of archaeological interest are a series of quarries (**D**) that were conformed as such during the Site visit. No other features of archaeological significance were identified.
- 4.124 The LiDAR data thus confirms the previous observations (see above), showing that features (earthworks) related to the former industrial exploitation of the landscape are present in the Site. As assessed above, these features possess very limited evidential value, but their presence and form does illustrate the former industrial use of the Site and thus they possess a low degree of historical value.

SITE WALKOVER

- 4.125 The Site was visited in January 2024.
- 4.126 Observations made during the Site visit have already been reported on above in respect of the Site's conditions, the visibility and setting of the scheduled monument and remains related to the colliery/mining levels.
- 4.127 Other observations made during the Site visit that relate to the Site's archaeological potential are as follows:
- Several levelled areas, rock faces and pits were noted (**Image EDP A1.19**) that appear to relate to quarrying, although they are not labelled as such on historic maps. It may be that quarrying occurred in the latter part of the 20th or 21st centuries. Such remains have very low heritage significance principally due to their historical value illustrating the past industrial use of the Site; and
 - Pits were noted in woodland to the south-west of the colliery (**Image EDP A1.20**). Whilst these pits may relate to surface mining, the greater likelihood is that they represent 'crown holes' or surface collapse due to below-ground mine workings. In this regard these are probably not historic assets in their own right but do relate to the Site's industrial history.
- 4.128 Otherwise, the Site visit did not identify any additional historic assets not already identified through other sources.

SUMMARY OF THE SITE'S ARCHAEOLOGICAL POTENTIAL

- 4.129 The sources considered above allow the following conclusions to be drawn regarding the Site's archaeological potential.

- 4.130 The Site contains a scheduled monument, Pen-Rhiw-Angharad Round Cairns (**GM276**), which is closely associated with adjacent cairns recorded by the RCAHMW and which relates highly to the monument's significance.
- 4.131 There is a moderate potential for additional prehistoric ritual or funerary cairns and related features, which could be of moderate or high significance, on the higher, southern slopes of the Site within areas of forestry.
- 4.132 But, that the potential for the Site to contain other buried remains of the prehistoric or Roman periods is low and of the early medieval or medieval periods, very low.
- 4.133 The Site contains earthworks and buried features related to the coal mining industry with the evidence suggesting that works occurred during the late 19th and early 20th centuries.
- 4.134 Notable features are:
- Earthwork and buried remains related to the Cefn Mawr Colliery (**Plan EDP 5: A and B**) and its associated incline tramway (no buildings are thought to be extant) – Low significance;
 - Earthwork remains related to mining levels (**Plan EDP 5: C**) and former tramways in the eastern part of the Site – Low significance; and
 - Open areas and pits related to quarries (**Plan EDP 5: D**) of uncertain but possibly late date at four locations – Very low significance.
- 4.135 Otherwise, the Site has a high potential to contain features related to land management or agriculture of the post-medieval-modern periods such as infilled ditches and denuded field banks that are of very low significance.

Section 5 Impact Assessment

- 5.1 This section of the report assesses the impact of the proposed development on the significance of historic assets, both in terms of direct effects to their physical fabric and from indirect effects, due to change within their settings.
- 5.2 In this regard it comprises Stage Three of the Cadw setting assessment process (Cadw, 2017).

PROPOSED DEVELOPMENT

- 5.3 The Proposed Masterplan is appended at **Appendix EDP 2**.
- 5.4 An outline planning application is to be submitted to NPTCBC for development of private holiday lodges, on land located between the settlements of Tonna and Resolven. The proposed scheme would create a premium holiday-resort development comprising those lodges, other supporting leisure, hospitality, and service facilities, as well as a new access road and associated infrastructure.
- 5.5 The proposal includes provision of an interpretation board situated adjacent to the Pen-Rhiw-Angharad Round Cairns Scheduled Monument.

DESIGNATED HISTORIC ASSETS

Pen-Rhiw-Angharad Round Cairns

- 5.6 No development is proposed that would directly affect the scheduled monument comprising the Round Cairns or those cairns that are located just outside of the scheduled area. The present woodland in which the monument lies would be entirely unaffected by development.
- 5.7 With regard to the monument's setting, aside from the proposed information board, the enclosed space in which the woodland that contains the monument lies would be subject to no development. The track running adjacent to the monument would be retained as it is and with its present function as a bicycle trail. It would not be used as an access to the proposed development, which would be up the valley from the north. As such, there would be no change to these aspects of the asset's current setting.
- 5.8 Woodland to the north and north-east of the scheduled monument within the Site would also be retained, coming into a management regime associated with the leisure use of the Site as opposed to commercial forestry, and would provide a dense screen of coniferous evergreen trees that will block any views year-round to the central parts of the Site that would be occupied by holiday chalets. The retained trees would serve to seclude the monument and the space around it from the wider development to the north and, in this regard, there would be no new buildings, or any other structures or infrastructure introduced into the monument's surroundings.

- 5.9 The development to the north and north-east would not affect any archaeological feature that might be associated with the monument. For example, the woodland to the north-east where possible cairns may be located will be retained as it is, albeit under a new management regime related to the sustainable use of the woodland for leisure purposes (such as walking trails) and any archaeological features within it would not be affected.
- 5.10 As such, the monument's setting would be unchanged, with aspects of it that contribute positively to the monument's significance unaffected, and no new structures introduced that would have an adverse effect.

Heritage Interpretation

- 5.11 It is proposed to provide an interpretation board adjacent to the track that passes the scheduled monument but located outside of the scheduled area.
- 5.12 This would present information on the nature of the monument and of the wider landscape of Bronze Age cairns to which it relates. It is anticipated that the information could include information on the Roman camp so as to present a more complete history of the landscape of which the Round Cairns are a part.
- 5.13 There is no information on the monument provided at present and so the board would facilitate a greater appreciation of the monument and of the history of the landscape generally to members of the public using the bicycle trail.
- 5.14 With reference to Cadw's guidance, the Setting of Historic Assets in Wales at Section 6 "*provision of appropriate interpretation*" is described as a possible enhancement measure. As such, the proposal will result in a minor degree of enhancement to the significance of the Round Cairns monument.

Other Designated Historic Assets

- 5.15 As identified in **Section 4**, only the south-western corner of the Site forms part of the setting of the scheduled monuments Blaen-Cwmbach Camp and Blaen-Cwmbach Earthwork located to the south-west along the ridge. The Site does not form part of the setting of any other designated historic asset.
- 5.16 As per the above, the south-western part of the Site will be unaffected by the proposed development and therefore will not change in appearance. The wider site, downslope to the north-east, where development is proposed, will be entirely screened year-round from the two scheduled monuments by the dense stand of retained coniferous trees within the Site on its western and south-western edges.
- 5.17 As such, the proposed development will not introduce any new buildings or other structures or infrastructure into the settings of these two scheduled monuments, nor will it affect the appreciation of any associations in the landscape that relate to their significance. In this regard, the proposed development will result in no change to the setting of these two assets and have no effect on their significance.
- 5.18 It is anticipated that the information board proposed at Pen-Rhiw-Angharad Round Cairns could also include information on the two scheduled monuments. Thus, there is potential

for a minor enhancement to their significance through this provision, which is not presently provided.

NON-DESIGNATED HISTORIC ASSETS

- 5.19 The potential direct impacts upon non-designated historic assets within the Site are set out below.

Earthwork and Buried Remains Related to the Cefn Mawr Colliery (Plan EDP 5: A and B)

- 5.20 A group of chalets and their associated access roads (the Spur) and infrastructure are proposed in the location of the former colliery and partially on or adjacent to its spoil tip.
- 5.21 It is likely that groundwork associated with this development such as clearance, levelling, stabilisation of the ground surface and the digging of foundations and services would remove or impact remains related to the former colliery, but probably not in their entirety.
- 5.22 For example, existing paths to the colliery, which probably reflect the routes of former tramways would be retained as routes within the development. Furthermore, it is notable that no development is proposed in the footprint of the former incline tramway as located within the Site. The proposed access route from the north would cross the tramway, but utilise an existing forest track in this location, so any impact on the earthwork would be minimal and very localised.
- 5.23 In this regard, the remains related to the colliery would be subject to a minor degree of adverse impact, such that a heritage asset of low significance would be subject to a minor impact.

Earthwork Remains Related to Mining Levels and Former Tramways in the Eastern Part of the Site (Plan EDP 5: C)

- 5.24 The masterplan indicates that no works are proposed in the eastern part of the Site that would affect the mining remains in this area. The existing tracks will be improved (re-surfaced and cleared) and utilised as part of a network of walking trails. It is not anticipated that this work would be on such a scale to have any implications for the large robust earthwork remains related to mining.
- 5.25 As such, there would be no effect on the significance of these historic assets.

Open Areas and Pits Related to Quarries (Plan EDP 5: D)

- 5.26 No development is proposed that would result in any change to the quarries. As such, there would be no effect on the significance of these historic assets.

Effects on the Setting of the Non-designated Mining Remains in the Site

- 5.27 As described above, the earthwork remains of the Site's mining history are not easily appreciated on the ground due to the considerable woodland and shrub growth across most

parts of the Site. Development will clear much of this vegetation particularly in the vicinity of the Cefn Mawr Colliery.

- 5.28 As such, whilst the chalets and other structures associated with the development will be imposed upon the former industrial landscape, the clearance of vegetation will probably allow for some of the earthworks, such as the remains of the incline tramway and large spoil tips around Cefn Mawr Colliery to become visually appreciable in the landscape.
- 5.29 Further to the east, the present situation will be largely unchanged with the earthwork remains related to mining contained within woodland, which will be accessed via walking trails.
- 5.30 As such, a negative aspect (the dense uncontrolled vegetation) will be removed thus making some of the features more visible, and appreciable but then modern buildings and infrastructure would be imposed upon part of the area of the former colliery, masking its remaining industrial era character and result in a minor negative effect to the colliery area.
- 5.31 In this regard, with a positive and a negative effect assessed, an overall neutral effect is concluded to the significance of the industrial era remains from change within their setting.

Effects on Unrecorded Buried Archaeology

- 5.32 As set out in **Section 4** the greatest likelihood is for further prehistoric cairns or related funerary or ritual features of the prehistoric era being located within dense woodland on the higher, south-eastern slopes of the Site.
- 5.33 There is no development proposed in this part of the Site with the woodland retained and managed to create a series of walking trails. This work is unlikely to result in damage to any prehistoric cairns. Indeed, if such features are encountered during woodland clearance for paths, then the removal of the woodland would be a benefit, and there is an opportunity for such features to be preserved at the path side or in clearings.
- 5.34 Elsewhere, there is only a low potential for archaeological remains other than remains of the post-medieval period related to agriculture and land management, of very low significance. Only development proposed within the central parts of the Site where chalets are proposed has potential to affect unrecorded archaeological remains.
- 5.35 Groundwork associated with this development such as clearance, levelling, stabilisation of the ground surface and the digging of foundations would potentially remove or damage archaeological remains in their footprint. However, given the potential of these areas the greatest likelihood is for the loss of remains that are only of very low heritage significance should they have survived the use of the site for industry.

Section 6 Conclusions

- 6.1 This Archaeological and Heritage Assessment concludes that the Site contains one designated asset, the Pen-Rhiw-Angharad Round Cairns Scheduled Monument, where there would be a presumption in favour of its physical retention or preservation *in situ*.
- 6.2 No development is proposed at or around the asset and it will be screened from the development by existing woodland, which will be retained. As such, the assessment concludes no effect on the significance of this asset either directly or due to change within its setting.
- 6.3 The development offers the implementation of an interpretation board at the Round Cairns that will explain their nature and that of the wider landscape to the public. This provision would potentially comprise a minor benefit to the scheduled monument and its significance.
- 6.4 Two scheduled monuments and three Grade II listed buildings are located within a 1km radius of the Site. The assessment concludes that none of these assets will be affected by the proposed development due to being entirely screened from it by intervening woodland.
- 6.5 With regard to 'non-designated' heritage assets, the Site contains extant earthwork remains related to late 19th and early 20th century coal mining. These areas are assessed as historic assets of low significance primarily because of their illustration of the Site's industrial exploitation in this era.
- 6.6 For the most part, these features will be retained in the Site although some localised loss of earthworks and buried remains may occur at the site of the former Cefn Mawr Colliery, which is proposed for development, resulting in a minor impact. Otherwise, whilst the setting of the industrial remains will be altered, this is assessed as resulting in an overall neutral consequence, resulting from both positive and negative effects.
- 6.7 In terms of the Site's archaeological potential, the only notable potential is for cairns, or other funerary or ritual features being located within dense woodland on the Site's higher south-eastern slopes. No development is proposed in these areas, so it is not anticipated that any such features, if present, will be affected.
- 6.8 Otherwise, the Site only has a low or very low potential for any archaeological remains other than very low value remains related to post-medieval land organisation and agriculture. It is notable that most of the Site will be unaffected by development with woodland retained and indeed managed, allowing greater access and the potential for archaeological features, if found, to be conserved. In this regard groundwork that could adversely affect buried archaeological remains, if present, would only occur in the central parts of the Site that are proposed for development and where the greatest potential is for remains of very low significance, the loss of which would be inconsequential.
- 6.9 Any loss of buried archaeological remains could be appropriately dealt with through a programme of archaeological recording prior to or during development, the scope of which

would be defined by NPTCBC (presumably via a planning condition) on the advice of their archaeological advisors, GGAT.

- 6.10 In conclusion, the proposed development of the Site would not contravene any heritage legislation and would accord with the Welsh Government's objectives for the historic environment as set out in PPW 12 (2024), such that the scheduled monuments within the site and those in its vicinity would be conserved along with their settings, as would any listed buildings. Effects on non-designated archaeological remains would be minor and in accordance with paragraph 6.1.27, PPW (2024), they could be recorded before their loss.
- 6.11 The proposals would also accord with the policies of the NPTCBC LDP (2016), particularly Strategic Policy SP21 such that the scheduled monument within the Site would be protected and enhanced through the provision of interpretation.

Section 7

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LIST OF CONSULTED MAPS

1846 Tithe map of the hamlet of Llantwit Lower, in the parish of Llantwit juxta Neath

The First Edition Ordnance Survey Map, 1884

The 1900 Edition Ordnance Survey Map

The 1921 Edition Ordnance Survey Map

The 1938 Edition Ordnance Survey Map

The 1964 Edition Ordnance Survey Map

The 1972 Edition Ordnance Survey Map

Appendix EDP 1 Photographs



Image EDP A1.1: View north-west across the Pen-Rhiw Angharad Round Cairns Scheduled Monument illustrating the vegetation that covers most of the monument with the only clearly visible cairn in the foreground.



Image EDP A1.2: View of the distinct mound at the western end of the cairn group.



Image EDP A1.3: Stone slab located just outside of the scheduled cairn group.



Image EDP A1.4: View illustrating the setting of the scheduled monument to the south, with the adjacent track, grassed spaces and ornamental trees visible.



Image EDP A1.5: View to the west of the scheduled monument with stone gate piers in the foreground and the ridge beyond. Much of the view includes the extent of the Blaen-Cwmbach Camp with the low rise in the middle distance occupied by Blaen-Cwmbach Earthwork and, slightly nearer, the location of an additional Bronze Age cairn.



Image EDP A1.6: View to the east of the scheduled monument illustrating the stone walls that define the entrance to the estate and trees of Pelena Forest beyond.



Image EDP A1.7: View to the south from the scheduled monument illustrating the extensive view.



Image EDP A1.8: View towards the scheduled monument from the north-east, illustrating the dense stand of trees that screens view towards it from the part of the Site that is proposed for development.



Image EDP A1.9: View of part of the rampart of the Roman camp illustrating how for most of its course is only very slight.



Image EDP A1.10: View of the western end of the Roman camp illustrating its best preserved external bank and ditch.



Image EDP A1.11: View across Blaen-Cwmbach Camp to the east towards the Site, from adjacent to the Blaen-Cwmbach Earthwork illustrating the character of the landscape and the screening effect of the coniferous trees on the Site's western edge.



Image EDP A1.12: Part of the ramparts of the Blaen-Cwmbach Earthwork illustrating its appearance.



Image EDP A1.13: View along the B4434 illustrating the dense stands of trees on either side for the road that screen views down to the Neath Canal (to the left).



Image EDP A1.14: View of the listed culvert and sluice on the Neath Canal illustrating its roadside setting. (Google Earth Streetview ©2024).



Image EDP A1.15: View across the location of the former Cefn Mawr Colliery illustrating the densely wooded nature of its location and setting.



Image EDP A1.16: View along one of the former tramways which cross the Site.



Image EDP A1.17: View of the extant mining level entrance in the eastern part of the Site.



Image EDP A1.18: View of one of the depressions adjacent to the track that may be a former entrance to a mining level.

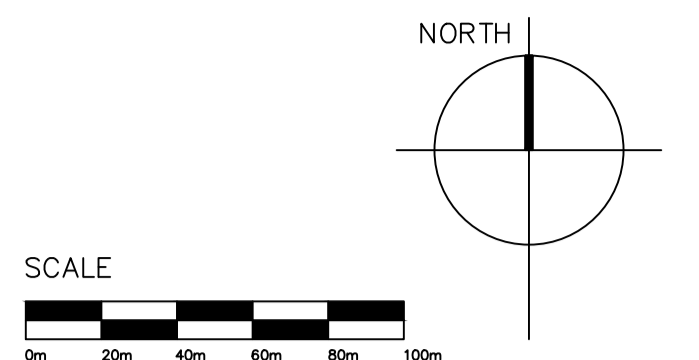


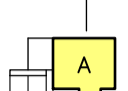
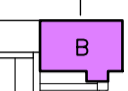
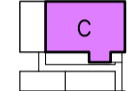

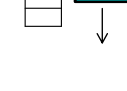
Image EDP A1.19: One of the former quarries in the Site with the rock face hidden just behind the trees.



Image EDP A1.20: One of the pits located to the south of Cefn Mawr Colliery possibly reflecting the collapse of underground workings.

Appendix EDP 2 Proposed Masterplan



- ### Lodges
-  Type A: 2 bed split level on slope
 -  Type B: 3 bed split level on slope
 -  Type C: 3 bed split level on slope wheelchair accessible
 -  Type D: 3 bed 1.5 storey cottage
 -  Type E: 4 bed 1.5 storey cottage

- ### Revisions
- A.** Spine road updated to 1:12 gradient, wheelchair accessible lodges added, lodges repositioned where required, hub area updated, visitor parking added, access roads rationalised
 - B.** Paths added, Hub building reduced in size and moved away from tree, Hydrock road updated, red line boundary updated to match conveyancing plan.
 - C.** Lodges and access roads moved to further reduce impact on tree belts at the Village Green, the Meander and the Spur. Service Centre area revamped to add 2 lodges. Accommodation schedule updated.
 - D.** Lodges reduced at the Spur to avoid ancient woodland, road to Spur repositioned to avoid Cat A tree, 4 lodges added north of the Hub. 1 lodge added at the Lookout. Notes re ancient woodland added. Accommodation schedule updated.
 - E.** Minor revisions to road radii to suit Hydrock tracking. Ancient woodland layer switched off. Trees to be removed identified. Off site trees shown adjacent to main access track. New trees, swales and ponds shown.
 - E1.** Red line boundary revised
 - F.** Update to tree line adjacent to access road.



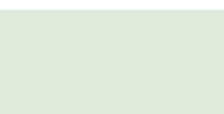
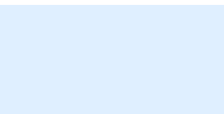
Accommodation Schedule

lodge type	bedrooms	area (m2)	area (sqft)	number	%
type A	2	92.9	1000	41	34%
type B	3	125.5	1350	14	12%
type C	3	120.5	1297	8	7%
type D	3	125.5	1350	40	33%
type E	4	149.7	1611	17	14%
total				120	100%

Legend

1. The Service Centre - refuse storage, maintenance building, sewage treatment plant
2. The Hub - single storey structure built into hillside with green roof over. Reception, pool, gym, sports, cafe bar, shop, management offices.
3. The Ponds - picnic spots and wild swimming
4. The Meadows - room in roof style lodges on plateaus and gentle slopes, arranged around wild meadows
5. The Village Green - room in roof lodges arranged around landscaped open space
6. The Meander - mixed lodge types on plateau edge
7. The Clearing - split level lodges on steep slopes, integrated with existing individual trees. New tree planting between terraces to minimise visual impact from afar.
8. The Lookout - split level lodges arranged along contours, with new tree planting to minimise visual impact from afar.
9. The Spur - mixed lodge types to suit topography on small plateau.
10. existing PRoW retained within development
11. no development near Scheduled Ancient Monument
12. link to National Cycle Route 47

Key

-  existing trees and woodland
-  proposed tree removals (refer to arboricultural report for detail)
-  new tree planting and woodland
-  ponds and swales

ross peedle architecture

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client: Trivselhus UK Holdings Ltd
 project: Parc Pellena holiday resort
 drawing: concept masterplan
 number: 2304/ 001 rev F
 date: 01.04.24
 scale: 1:2000 @ A1

Plans

Plan EDP 1: Overview of Known Designated Heritage Assets
(edp6556_d003a 12 April 2024 PDr/EBR)

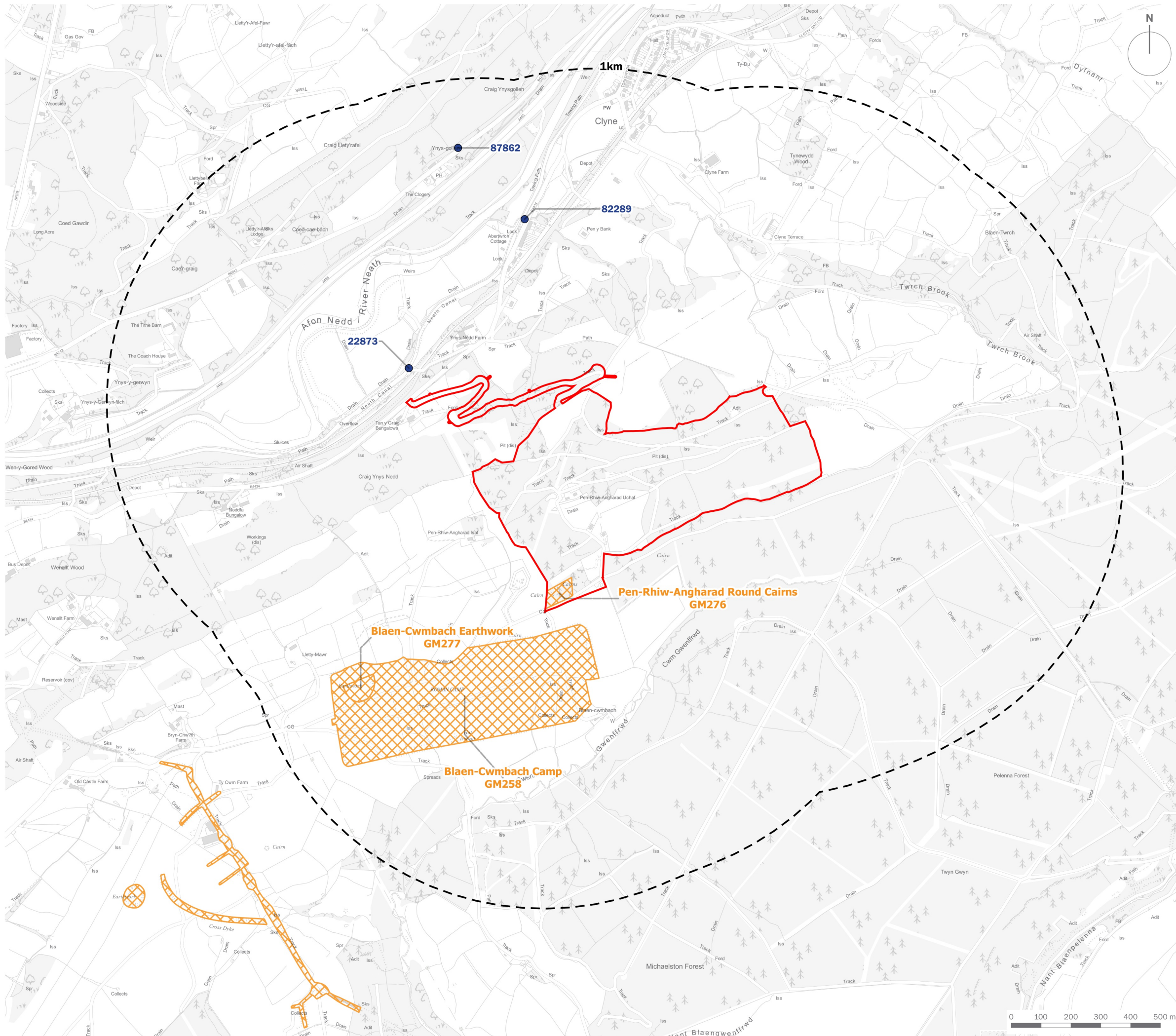
Plan EDP 2: Overview of Known Non-designated Heritage Assets
(edp6556_d004a 12 April 2024 PDr/EBR)





Plan EDP 3: Extracts of 1846 Tithe Map of the Hamlet of Llantwit Lower
(edp6556_d005a 12 April 2024 PDr/EBR)

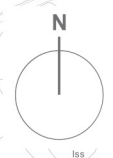
Plan EDP 4: Extracts of Historic OS Mapping
(edp6556_d006a 12 April 2024 PDr/RSk)

Plan EDP 5: Extracts of LiDAR Imagery
(edp6556_d007a 12 April 2024 PDr/EBR)

Plan EDP 6: Historic Assets in the vicinity of Pen-Rhiw-Angharad Round Cairns Scheduled Monument
(edp6556_d015a 12 April 2024 DJo/RSk)



-  Site Boundary
-  1 km Range Ring
-  Grade II Listed Building
-  Scheduled Monuments



client
Trivselhus UK Holdings Limited

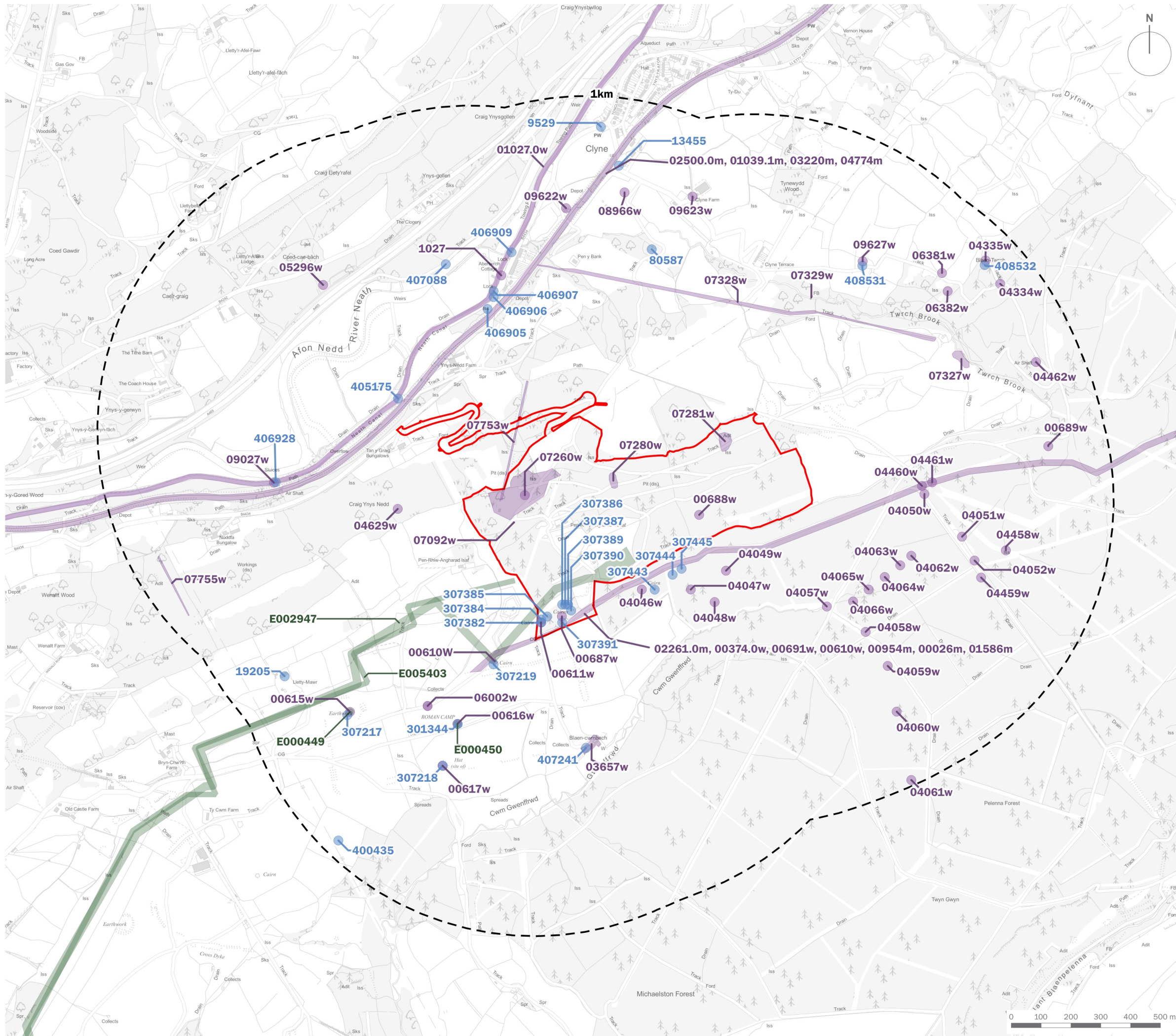
project title
Parc Peledda Holiday Resort

drawing title
Overview of Known Designated Heritage Assets

date	12 APRIL 2024	drawn by	PDR
drawing number	edp6556_d003a	checked	EBR
scale	1:12,500 @ A3	QA	DJo



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- Site Boundary
- 1 km Range Ring
- HER Monument
- HER Event
- National Monument Record

client
Trivselhus UK Holdings Limited

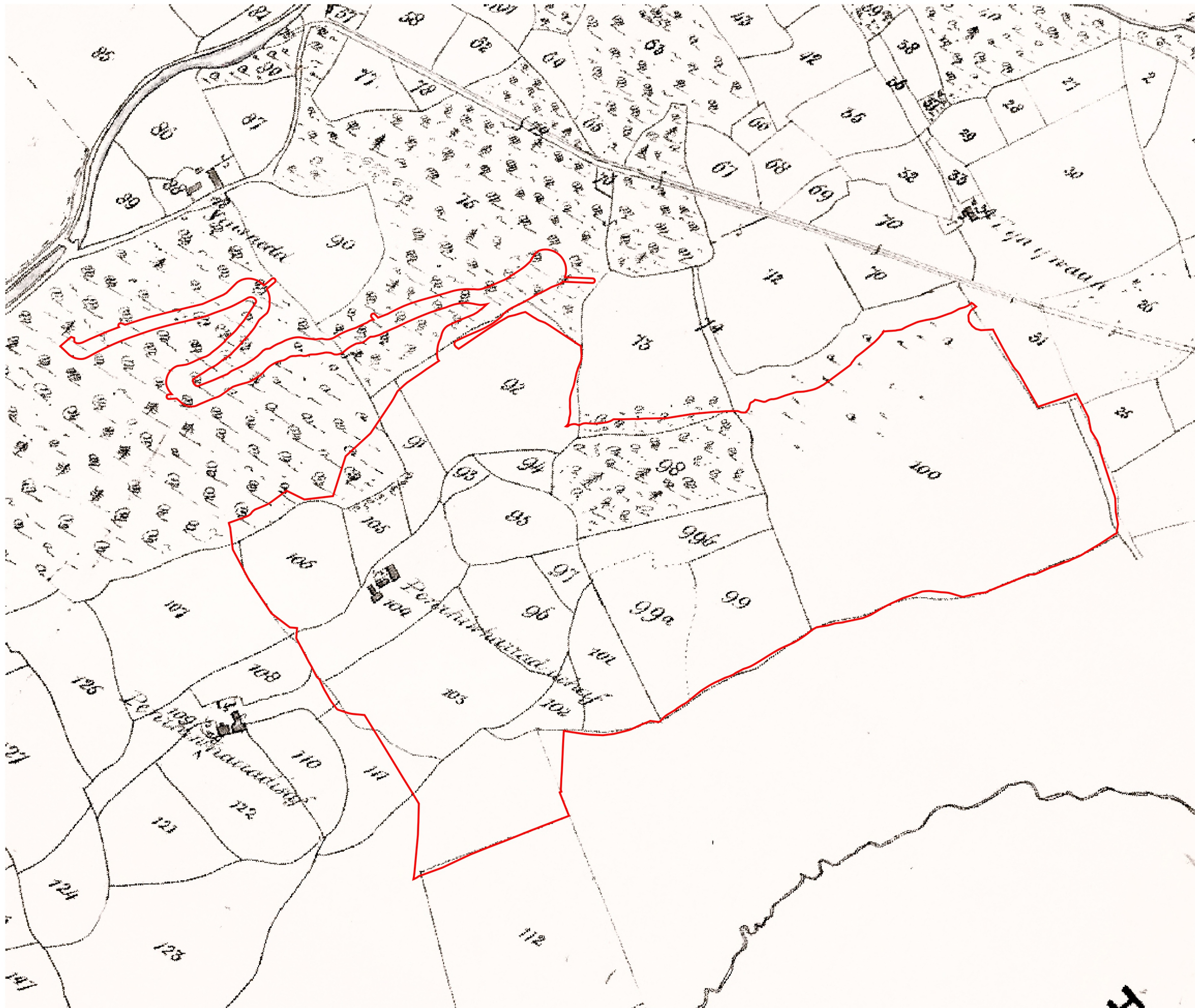
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drawing title
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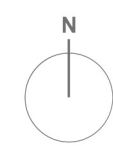
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scale **1:12,500 @ A3** QA **DJo**



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 Approximate Site Boundary



client
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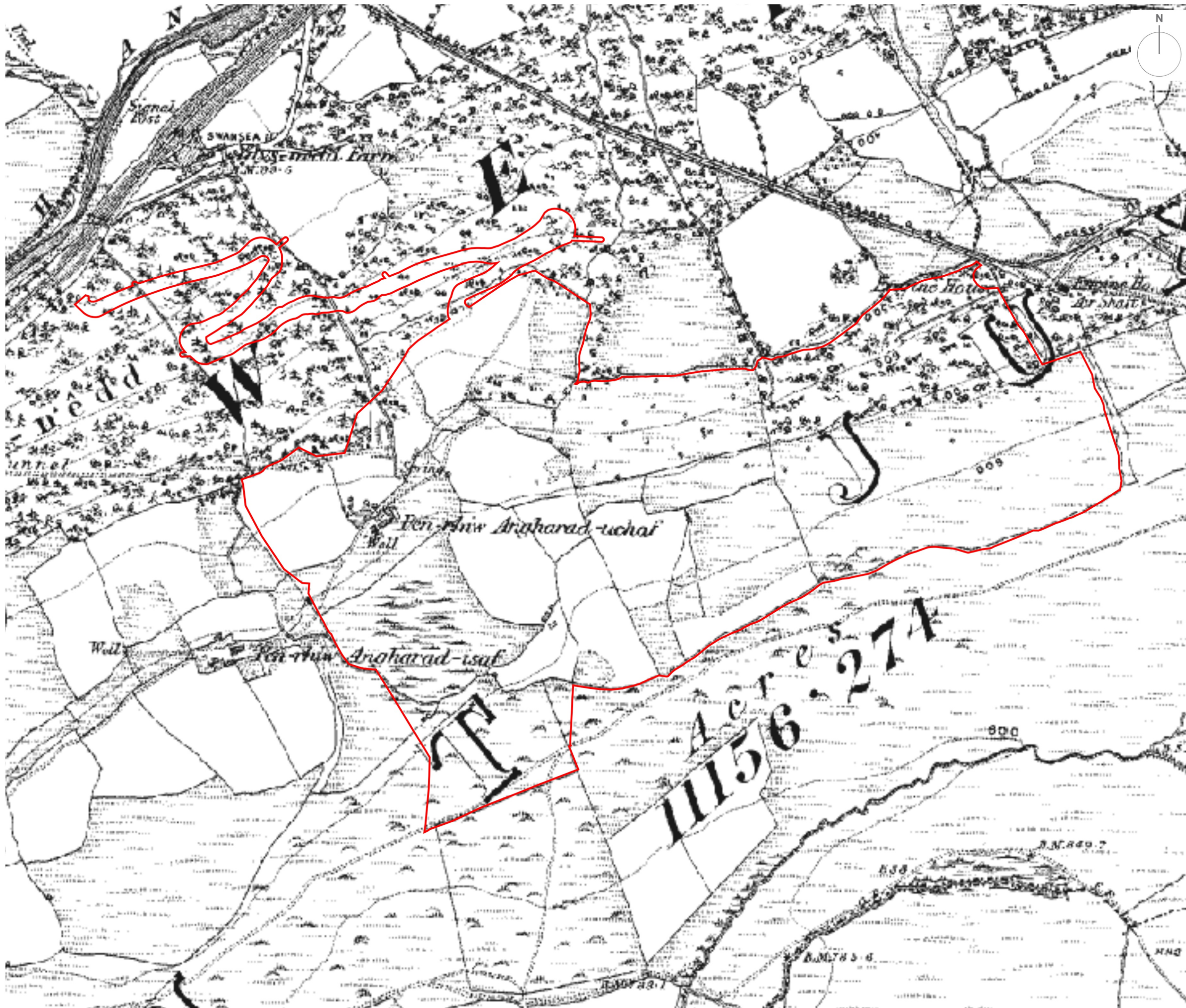
project title
Parc Pelenna Holiday Resort


drawing title
Extracts of 1846 Tithe Map of the Hamlet of Llantwit Lower

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drawing number	edp6556_d005a	checked	EBR
scale	1:5,000 @ A3	QA	DJo



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 Approximate Site Boundary

client
Trivselhus UK Holdings Limited

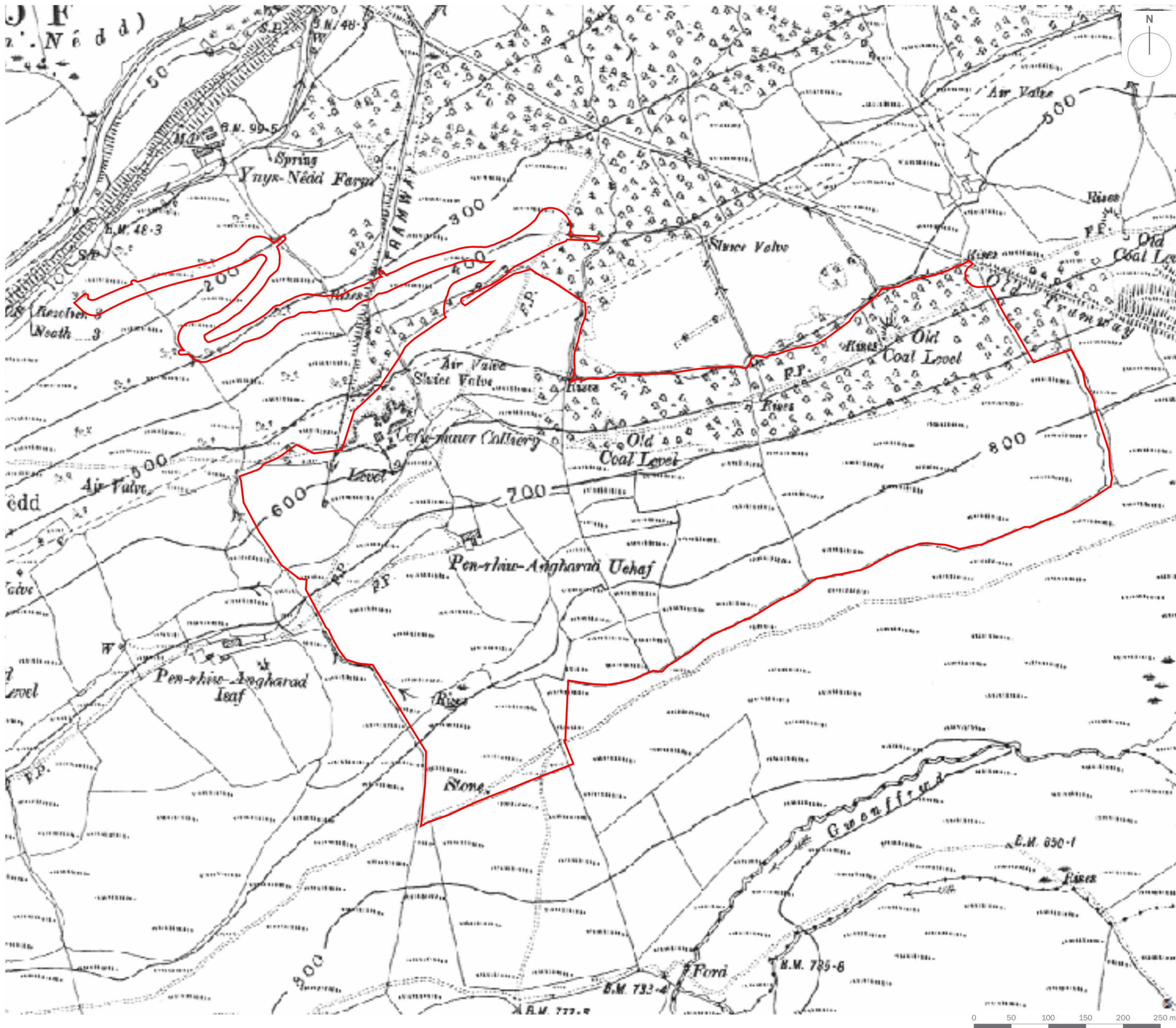
project title
Parc Pelenna Holiday Resort


drawing title
Extracts of Historic OS mapping (1884)

date **12 APRIL 2024** drawn by **PDR**
drawing number **edp6556_d006a** checked **RSK**
scale **1:5,000 @ A3** QA **DJo**



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 Approximate Site Boundary

client
Trivselhus UK Holdings Limited

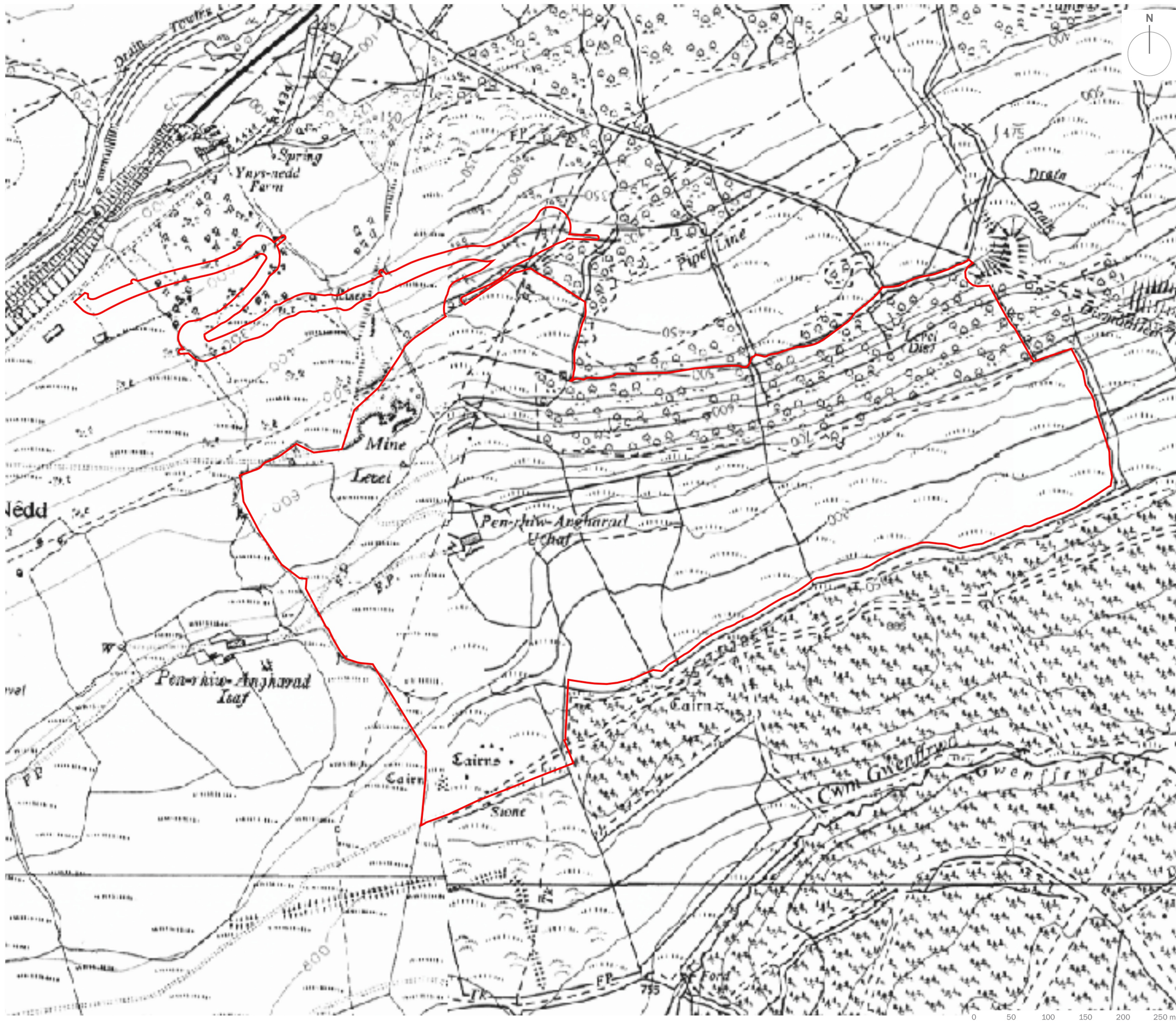
project title
Parc Pelenna Holiday Resort


drawing title
Extracts of Historic OS mapping (1921)

date	12 APRIL 2024	drawn by	PDr
drawing number	edp6556_d006a	checked	RSK
scale	1:5,000 @ A3	QA	DJo



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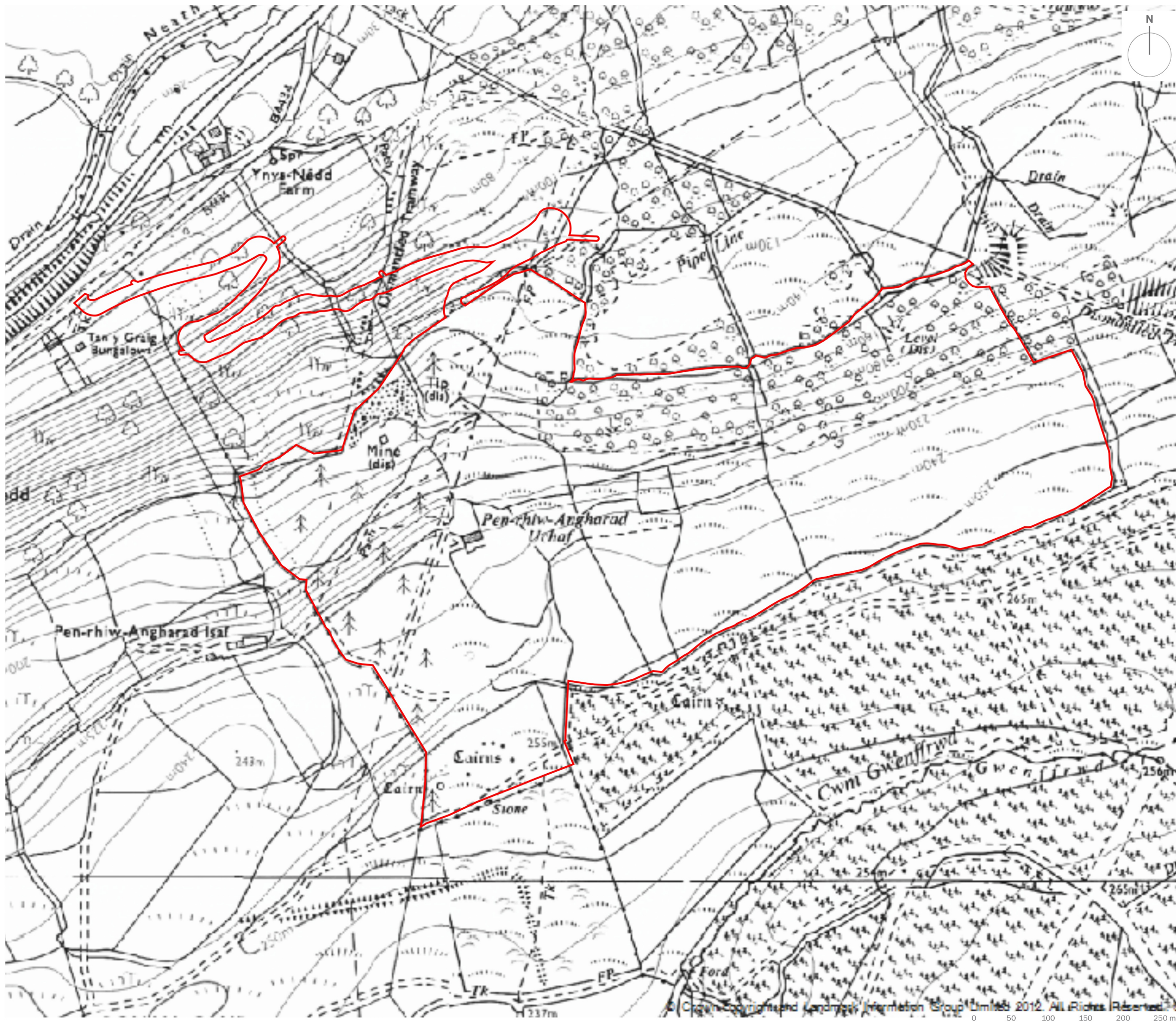



 Approximate Site Boundary

client	Trivselhus UK Holdings Limited		
project title	Parc Pelenna Holiday Resort		
drawing title	Extracts of Historic OS mapping (1964)		
date	12 APRIL 2024	drawn by	PDr
drawing number	edp6556_d006a	checked	RSK
scale	1:5,000 @ A3	QA	DJo



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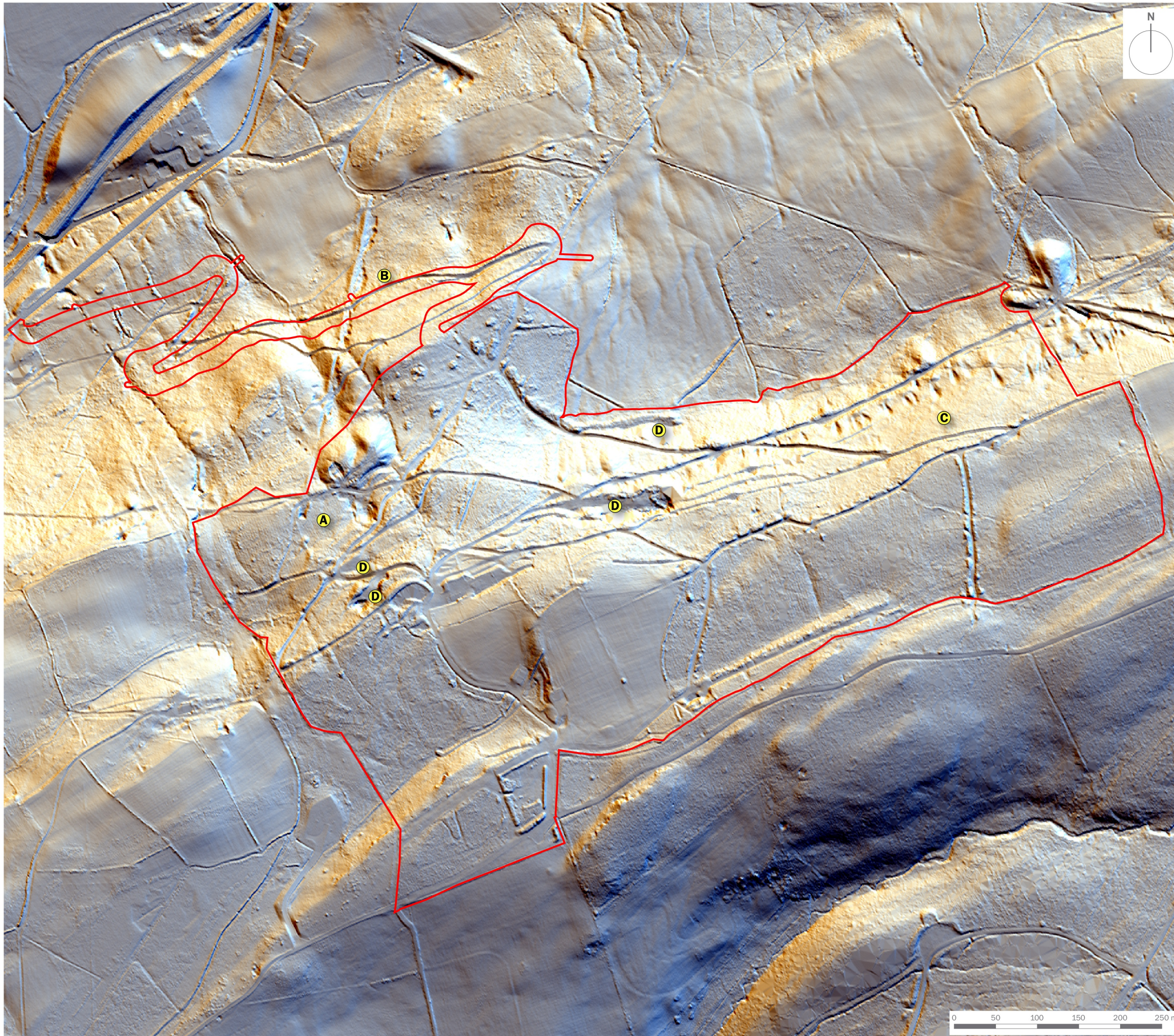


 Approximate Site Boundary

client	Trivselhus UK Holdings Limited		
project title	Parc Pelenna Holiday Resort		
drawing title	Extracts of Historic OS mapping (1973)		
date	12 APRIL 2024	drawn by	PDr
drawing number	edp6556_d006a	checked	RSK
scale	1:5,000 @ A3	QA	DJo



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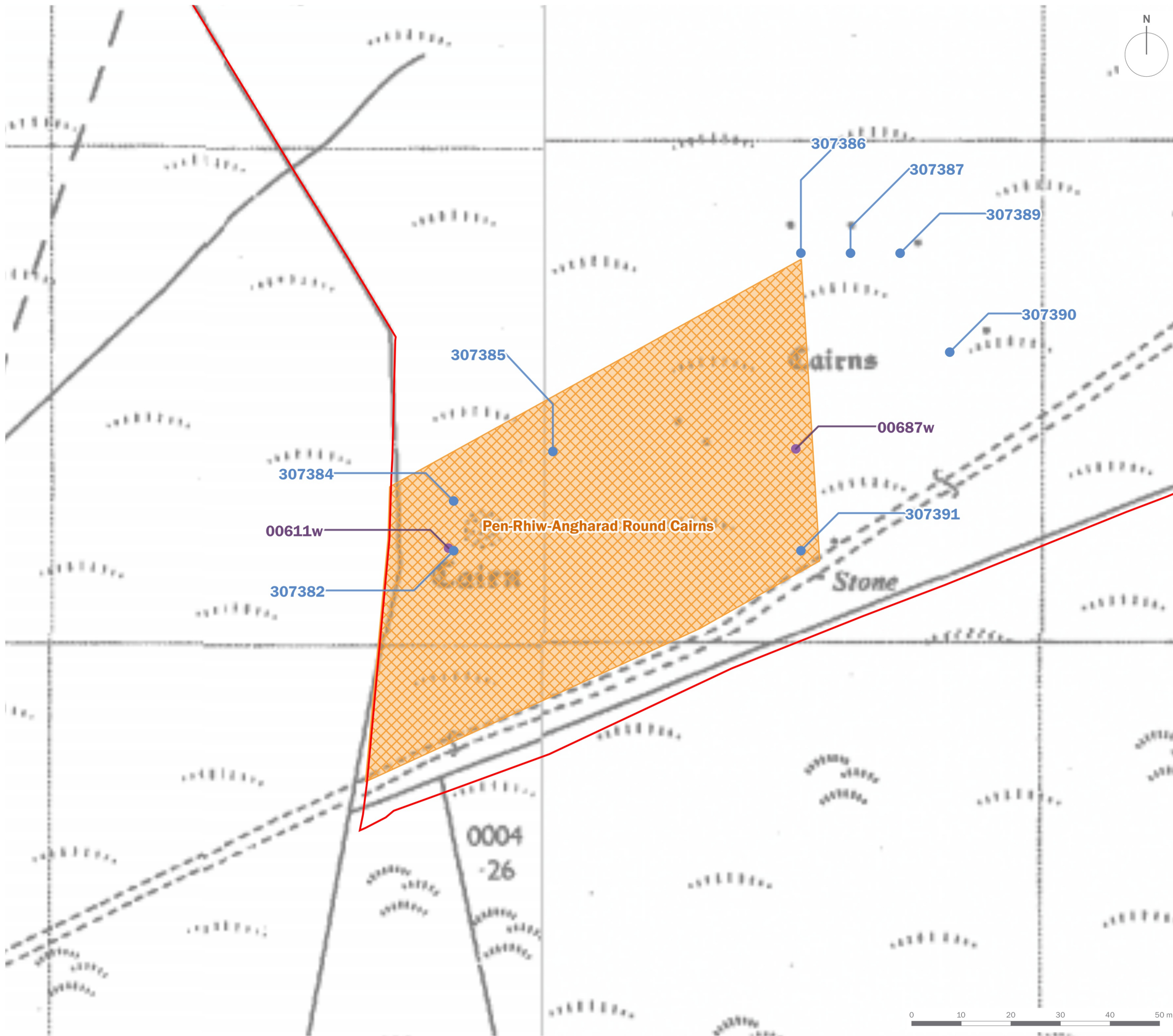
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- A Remains Related to Cefn-mawr Colliery
- B Remains of the Cefn-mawr Colliery Incline Tramway
- C Earthwork Related to Mining Levels
- D Quarry Site

client
Trivselhus UK Holdings Limited

project title
Parc Pelenna Holiday Resort

drawing title
Extracts of LiDAR Imagery

date	12 APRIL 2024	drawn by	PDr
drawing number	edp6556_d007a	checked	EBR
scale	1:4,500 @ A3	QA	DJo



- Site Boundary
- 1 km Range Ring
- National Monument Record
- HER Monument
- Scheduled Monument



client
Trivselhus UK Holdings Limited

project title
Parc Pelenna Holiday Resort

drawing title
Heritage Assets in Vicinity of Pen-Rhiw-Angharad Round Cairns Scheduled Monument

date	12 APRIL 2024	drawn by	DJo
drawing number	edp6556_d015a	checked	RSK
scale	1:750 @ A3	QA	RBa



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