

Galileo Empower
On behalf of Bryn Cadwgan Energy
Park project team

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Eich cyf/Your ref:

Ein cyf/Our ref:

Dyddiad/Date: 25 Sep. 25

Dear Sir/Madam

Bryn Cadwgan Energy Park

Thank you for your email of 13 August consulting us on the above proposed development of national significance (DNS).

Advice

Cadw has reviewed the details and has determined additional information is required.

The national policy and Cadw's role in planning are set out in Annex A.

A list of historic assets is in Annex B.

Assessment

The proposed access road will cross part of scheduled monument CM226 Pumpsaint Roman fort and part of its non-scheduled vicus (settlement). Archaeological evaluation has determined the depth of the archaeological deposits and the track route has been designed to run on a bank, reinforced with aluminium sheets, across both the designated and undesignated areas. When the access track is not in use, the aluminium sheets will be removed but the earthworks will remain until the windfarm is no longer operational.

Cadw have considered these proposals in detail, determined that the mitigation measures will prevent the access track having any direct impact on the buried archaeological features and that the visual impact of the earthwork during the operational period of the windfarm is acceptable. Consequently, scheduled monument consent has been granted in accordance with section 18 of the Historic Environment (Wales) Act 2023. The direct impact on scheduled monument CM226 does not therefore need to be considered during the determination of this application.

The application will be accompanied by an environmental statement produced by Ramboll with chapter 6 considering the impact of the proposed development on the Cultural Heritage based on information provided in technical appendices produced by AOC. These works have identified that the proposed development will have, in

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Environmental Impact Assessment terms, significant effects on the settings of the following scheduled monuments and undesignated archaeological sites:-

- Scheduled Monument, CD210 Round Cairns c. 400m SE of Lan Fawr
- Scheduled Monument, CD240 Penrhiwllwydog Round Cairn
- Scheduled Monument, CD241 Cefn Cnwcheithinog Standing Stone
- Scheduled Monument, CD254 Blaen Nant-y-Rhiw Round Cairn
- Scheduled Monument, CD255 Carn Saith-Wraig Round Cairns
- Scheduled Monument, CM301 Mynydd Mallaen Standing Stone
- Scheduled Monument, CM300 Maen Bach Standing Stone
- Scheduled Monument, CM302 Crugiaau Merched Cairns,
- Scheduled Monument, CM169 Carn Fawr Round Cairn
- Scheduled Monument, CM343 Nant Gwyn Round Cairn & Standing Stone
- Scheduled Monument, CM364 Carn Nant-yr-Ast Round Cairn
- Non-Designated Asset, 64773 Nant-yr-Ast Farmstead
- Non-Designated Assets 258 and 263 Crug Siarls Cairn Group 1

The authors of the Environmental Statement, however, consider that, whilst these effects will be significant, they will not reach the levels which it is considered constitutes “an unacceptably damaging effect upon the setting of a scheduled monument” the criteria which section 6.1. 24 of Planning Policy Wales indicates would be grounds for refusing the application. Moreover, sections 6.7.12 to 6.7.17 of the Environmental Statement outlines a series of enhancement opportunities that will be considered to be implemented to offset or compensate the scale of these effects

The Environmental Statement also considers that the proposed development will have a significant effect on the Registered Dolaucothi Landscape of outstanding historic interest. Measures to offset or compensate the scale of this effect are also included in sections 6.7.12 to 6.7.17 of the Environmental Statement.

Cadw concur with the current assessment of the effect of the proposed development on the settings of these historic assets and that the proposed Measures to offset or compensate can be taken into account when the benefits of the proposed development are considered against the adverse effects by the determining authority. However, the Environmental Statement identifies that there is a High potential for previously undiscovered prehistoric assets to be found within the Application Site. If these sites exist, they may be connected to the known historic assets and contribute to their settings.

Section 6.4.24 of the Environmental Statement states that a geophysical survey has been carried out, with the results being presented in Technical Appendix 6.4: Geophysical Survey Report. However, this appendix has not been included in the documents included in the statutory pre-application consultation so currently we are unable to review the results of the geophysical survey.

A synopsis of the results of this report is given in section 6.4.25 of the Environmental Statement, which indicates that archaeological features have been identified by the geophysical survey, including parallel ditch-like features and discrete anomalies at the location of Turbine 4 at the base of the southern slopes of Crug Siarls and close to the non-designated cairn of likely Bronze Age date (Asset 263), features considered to be

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of archaeological origin; although the rugged terrain at this location has precluded a more confident interpretation. A further two anomalies of uncertain origin, were recorded on the high ground of Banc y Garth.

In cases where archaeological features have been identified but their function, extent and significance has not been determined, there is a need, in accordance with section 6.1.26 of Planning Policy Wales, for archaeological evaluation to be carried out prior to the determination of the application so that the effect of the proposed development on them and their settings, and those of other historic assets, can be determined. There is therefore a need for archaeological evaluation to be carried out before the full effect of the proposed development on the Cultural Heritage can be determined and the Environmental Statement completed.

Yours sincerely,

Historic Environment Inspectorate / Arolygiaeth yr Amgylchedd Hanesyddol