



Llywodraeth Cymru
Welsh Government

Plas Carew, Uned 5/7 Cefn Coed
Parc Nantgarw, Caerdydd CF15 7QQ
Ffôn 0300 025 6000
ebost cadw@llyw.cymru
www.cadw.gov.wales

Plas Carew, Unit 5/7 Cefn Coed
Parc Nantgarw, Cardiff CF15 7QQ
Tel 0300 025 6000
email cadw@gov.wales
www.cadw.gov.wales

Wendy Hurst
Lidl UK GmbH
Waterton Industrial Estate,
Cowbridge Road,
Bridgend
CF31 3PH

Eich cyfeirnod
Your reference

Ein cyfeirnod
Our reference

CM009

Dyddiad
Date

21 June 2019

Llinell
uniongyrchol
Direct line

03000 256005

Ebost
Email:

Matthew.coward@gov.wales

Dear Ms Hurst,

ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979 APPLICATION FOR SCHEDULED MONUMENT CONSENT THE BULWARKS (CIVIL WAR), CARMARTHEN

1. Introduction

1.1 Thank you for your application of 18 May 2018 for scheduled monument consent to widen the existing access road from 5m to almost 9m, provide up to 26 car parking spaces and landscape part of the scheduled monument known as The Bulwarks (Civil War), Carmarthen. I note that this application relates to those works that physically impact on the scheduled monument and that the corresponding application for planning permission for the wider scheme including, for example, the construction of the main store and the provision of loading and storage facilities is currently with Carmarthenshire County Council for determination. Our outstanding comments to the Council as a statutory consultee on the planning application will be sent shortly and will, of course, be consistent with this decision.

1.2 Each application for scheduled monument consent is considered on its own merits in accordance with *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* ([Conservation Principles](#)) and Annex A of *Technical Advice Note 24: The Historic Environment* (TAN 24). In particular, TAN 24 explains that the main purpose of scheduling is to ensure the preservation of ancient monuments and, when considering an application for scheduled monument consent, there is a presumption against proposals which would involve significant alteration or cause damage or which would have a significant impact on the setting of remains.

2. Assessment

2.1 Your application and the supporting documentation has been assessed by our Regional Inspector of Ancient Monuments who has recommended that conditional scheduled monument consent should be approved for the elements of the application relating to the proposed car parking and the access road. However, he

Mae Gwasanaeth Amgylchedd Hanesyddol Llywodraeth Cymru (Cadw) yn hyrwyddo gwaith cadwraeth ar gyfer amgylchedd hanesyddol Cymru a gwerthfawrogiad ohono.

The Welsh Government Historic Environment Service (Cadw) promotes the conservation and appreciation of Wales's historic environment.

Rydym yn croesawu gohebiaeth yn Gymraeg ac yn Saesneg.
We welcome correspondence in both English and Welsh.



BUDDSODDWR MEWN POBL
INVESTOR IN PEOPLE



has recommended that scheduled monument consent should be refused for the elements of the application relating to landscaping and planting. The reasons for the Inspector's conclusions are set out in Annex A of this letter.

2.2 I have carefully considered the impact of the proposed development on the scheduled monument and its setting in light of the advice that I have received from Cadw's Regional Inspector of Ancient Monuments. I have also very carefully considered the objections that we have received from Carmarthen Civic Society and two members of the public.

2.3 After very careful consideration I have no reason to disagree with the advice of our Regional Inspector and am satisfied that his recommendation is consistent with the objectives of Conservation Principles and TAN 24.

3. Decision

3.1 Accordingly, I hereby approve conditional scheduled monument consent for the proposed widening of the access road but at a reduced width as set out in the below conditions, and for the provision of car parking spaces along the south-western side of the scheduled monument. However, I hereby refuse scheduled monument consent for the proposed landscaping and planting. As I have mentioned previously, I have no reason to disagree with the advice of our Regional Inspector and the rationale for my decision is therefore explained in Annex A.

3.2 In reaching this decision, I have taken into account the requirement of sections 3 and 5 of the Wellbeing of Future Generations Act 2015. I consider that this decision is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers well-being objective of *A Wales of vibrant culture and thriving Welsh Language*.

3.3 The development control issues associated with the wider development are subject to the application for planning permission and it is the responsibility of the applicant to establish whether any further approval or consents are required for the proposed development.

4. Conditions

4.1 The proposed conditions are intended to protect the monument from damage or significant alteration as set out in *TAN 24 : The Historic Environment*.

4.2 The applicant shall afford access at all reasonable times to any Cadw official or archaeologist nominated by Cadw to monitor progress of the works. Cadw shall be given two weeks written notice (e-mail notification is acceptable) in order for its representatives to monitor on site activity.

4.3 With the exception of the required adjustments and alterations set out in later conditions, works shall be carried out strictly in accordance with the following approved plans and documents listed below. No variations from these plans and documents are permitted unless they have been authorised in advance in writing by Cadw.

Number	Document / plan	Reference (where applicable)	Date
1	Application for scheduled monument consent signed by Wendy Hurst		18/05/2018
2.	Cotswold Archaeology Heritage Assessment (updated)	Cotswold Archaeology report 18170	23/05/2018
3	Advice note on amended layout	CA 6579	20/12/2018
4	Cotswold Archaeology information provided with amended class 7 request (Car park layout)	CA drawing 6579	25/03/2019
5	Typical external works details (car park)	SP-04	26/03/2019
6	Cotswold Archaeology Evaluation Report (revised)	CA Report 6791-1	15/05/2019
7	Site plan, latest version	5872BR 00 00 DRA 900100	05/17/2019
8	Landscape proposals plan	173-2018./83 Rev H	09/2018
9	Landscape methodology and 5 year aftercare	2 nd February 2019	02/02/2019

4.4 The area of the car park extension within the scheduled area shall be surfaced with grasscrete or some similar sympathetic surface to reduce the aesthetic impact of the car park on the monument. Cadw must approve in advance a material proposed by the applicant.

4.5 The hoop barriers at the edge of the car parking area shall be located within the footprint of the previously evaluated area and not within previously undisturbed ground within the scheduled area unless agreed otherwise with Cadw.

4.6 The widening of the access road shall be reduced by a width of 1m adjacent to evaluation Trench 2 in order to avoid impact on archaeological deposits observed at the northern end of the trench, any continuation of these to the north and the crest of the upstanding northern bank of southern bastion. Cadw must agree in writing the east-west extent of the proposed reduction.

4.7 No signs, posts, barriers or any other related furniture shall be located within the scheduled area unless otherwise approved in writing by Cadw.

4.8 There shall be no planting of trees, shrubs or hedges within the scheduled area as set out in the Landscape Proposals document.

4.9 No ground-disturbing landscaping measures (scarification, cultivation) shall be undertaken within the scheduled area.

4.10 Temporary fencing shall be erected to protect all areas of the monument unaffected by the proposed development during the course of works. This shall not disturb the ground in any way (i.e. Herras fencing or some similar product supported on concrete feet).

4.11 There shall be no vehicle or machine tracking, parking or the storage of materials within the scheduled areas during the course of works.

4.12 No works, including site clearance, shall commence until Cadw has been informed in writing of the name of an appropriately qualified and experienced archaeological contractor who is to be present during the undertaking of any outstanding excavations within the scheduled area so that a watching brief can be conducted.

4.13 No works shall commence until Cadw has approved a Written Scheme of Investigation (WSI) for the watching brief. A digital copy of the watching brief report shall be submitted to Cadw for approval within one month of the archaeological fieldwork being completed.

4.14 All staff, contractors and subcontractors shall be given a 'toolbox talk' at the start of works by the appointed project archaeologist on the scheduled status of the site and the sensitivities and restrictions that apply.

4.15 Cadw's representative shall be invited to attend a start of works site meeting to review the programme, submitted method statement and arrangements that have been established for archaeological mitigation. This meeting will also establish an appropriate monitoring regime for the duration of the project.

4.16 Any historic or archaeological features (not previously identified) which are revealed when carrying out the works shall be retained *in-situ* and reported to Cadw within two working days. Works shall be halted in the area/part of the site affected until provision has been made for retention and/or recording of the feature by a suitably qualified archaeologist in accordance with details submitted to and approved in writing in advance by Cadw.

4.17 The applicant shall discuss with Cadw opportunities for site interpretation to inform shoppers and visitors of the monument's significance. Cadw would be pleased to provide advice on the content of any such interpretation and must approve its location.

5. Compliance

5.1 Where a condition requires approval or any contact with Cadw you are advised to contact Will Davies, Cadw's Regional Inspector of Ancient Monuments by email Will.Davies@gov.wales or by telephone on 03000 258010.

5.2 Section 2(6) of the 1979 Act provides that non-compliance with a condition attached to a grant of scheduled monument consent shall be an offence.

5.3 By virtue of Section 4 of the 1979 Act if no works to which this consent relates are executed or started within 5 years from the date of this letter, the consent shall cease to have effect at the end of that period (unless it is revoked in the meantime).

5.4 This letter does not convey any approval or consent required under any enactment, bylaw, order or regulation other than Section 2 of the Ancient Monuments and Archaeological Areas Act 1979. It is the responsibility of the applicant to obtain any such approval or consent where necessary.

6. Mechanism for Challenge

6.1 Section 55 of the 1979 Act explains that if you are aggrieved by the decision given in this letter, you may challenge its validity by applying to the High Court within six weeks from the date of my decision. Furthermore, the legislation explains that the grounds on which an application may be made to the Court are:

- a) that my decision is not within the powers of the Act (ie that I have exceeded the powers available under the Act); and
- b) that any of the relevant requirements set out in the Act have not been complied with and that your interest has been substantially prejudiced by the failure to comply.

The "relevant requirements" mentioned above are defined in Section 55 of the 1979 Act and it is advisable to seek legal advice before taking any action.

6.2 Should you have any queries please do not hesitate to contact me.

6.3 Finally, please note that your personal data is managed in compliance with the [General Data Protection Regulations](#).

Yours sincerely,



Matthew Coward
Senior Heritage Planning and Designations Manager
Signed under authority of the Deputy Minister for Culture, Sport and Tourism,
one of the Welsh Ministers

**ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979
APPLICATION FOR SCHEDULED MONUMENT CONSENT
THE BULWARKS (CIVIL WAR), CARMARTHEN**

INSPECTOR'S ADVICE

1. Policy Context

1.1 *Technical Advice Note 24: The Historic Environment* explains that the main purpose of scheduling is to ensure the preservation of ancient monuments and there is a presumption in favour of their physical preservation when considering an application for scheduled monument consent. This means that there is a presumption against proposals which would involve significant alteration or cause damage, or which would have a significant impact on the setting of remains. Therefore, applicants are expected to demonstrate that no practicable alternative route or location, avoiding the scheduled area, exists and that the need to undertake works outweighs the presumption in favour of the protection of the scheduled monument.

1.2 The Welsh Government's six principles for sustainable management of the historic environment in Wales are also used as a guide when considering applications for scheduled monument consent. These are:

- Historic assets will be managed to sustain their values.
- Understanding the significance of historic assets is vital.
- The historic environment is a shared resource.
- Everyone will be able to participate in sustaining the historic environment.
- Decisions about change must be reasonable, transparent and consistent.
- Documenting and learning from decisions is essential.

2. The Bulwarks (Civil War), Carmarthen

2.1 The monument comprises the sole remains of extensive earthwork defences dating to the Civil War, (1642-51), built to protect Royalist held Carmarthen. These consist of low, broad banks and ditches with projecting earthen bastions to the NW and SE, designed to fire from and absorb the shock of artillery fire. They faced west directly into the development site where a central section of bank survives to a height of c 0.7m fronted to the west by a ditch c 1.6m deep externally and 2.3m below the crest of the bank. North and south of this are the two polygonal projecting bastions of which only the northern is well preserved, with the depth of the ditch being c 2m below the exterior and 4m below the crest of the now slight bank. The central bank and southern bastion now lie within the grounds of the former police facility, where they have been well maintained as grassed areas.

3. The Application

3.1 The application for scheduled monument consent involves (i) widening an existing access road into the scheduled monument, (ii) providing up to 26 car parking spaces on the monument including hooped fence barriers between the new spaces and the monument and (iii) landscaping including two small plant beds.

3.2 The works form part of a wider proposal to construct a store, loading and storage facilities, other ancillary structures and associated car parking and access improvements to replace the existing police headquarters and its outbuildings. We are commenting separately to the local planning authority on the corresponding application for planning permission.

4. Background

4.1 The applicant's initial Heritage Assessment produced by Cotswold Archaeology was unsubstantiated with detailed evidence to support the assertion that *the 'boundary had already been encroached by the existent road and sidewalks for the development of the former Police Station and the widening of the road, as it is, is not likely to result in any further intrusive effects'*. Due to the lack of supporting evidence we agreed to an archaeological evaluation being undertaken.

4.2 The scheme was subsequently revised in response to our concerns about the impact of the proposed development on the setting of the monument. The resultant redesign saw the movement of the proposed main building away from the edge of the scheduled area to the opposite (south-western) side of the development site. This then required the relocation of up to 26 car parking spaces extending some 5m into a strip of land running inside the south-western edge of the scheduled area (in front of the ditch to the main rampart). I note that this element of the scheme is explored in Cotswold Archaeology's '*Advice note on Amended Layout*' (CA6579).

4.3 The construction of the proposed parking spaces into the scheduled area involves relatively shallow ground disturbance and no significant alteration of ground levels in front of the monument and a limited previous evaluation of the footprint of a demolished ancillary structure at the northern end of this area indicated modern debris to just below the turf layer. We therefore agreed for the archaeological evaluation associated with the road widening to include a strip, map and record exercise for the full length of the area of the proposed car parking in order to inform the decision on the application for scheduled monument consent.

5. Archaeological Evaluation

Design and Rationale

5.1 The brief and subsequent Written Scheme of Evaluation (WSI) for the archaeological evaluation of the car parking area and widening of the access road are summarised in this section of my report.

5.2 Access Road (Trenches 1-3) - the rationale for the widening of the road into the scheduled area of the southern bastion was that the earthwork had already been

substantially levelled at this point, the applicant drew attention to existing cable runs crossing the earthworks at the level of the present access road, indicating additional sub-surface disturbance. The presence of services precluded a standard area evaluation of this strip and it was therefore agreed to evaluate the break of slope of the adjacent bank of the earthwork with three small trenches. These were excavated as specified onto the topmost archaeological layer, natural or a maximum depth of 1.2m, whichever was encountered first. We agreed to an excavation of three trenches rather than an area strip in order to avoid disturbing more earthwork bank than was necessary.

5.3 Car Parking (Trench 4) - this area was subject to a strip, map and record exercise, the turf and topsoil being removed by machine under constant supervision to the topmost archaeological layer, natural or the required depth, whichever was encountered first. The required depth of excavation varied with a slight N-S slope from a maximum of 0.8m to the north to some 0.5m at the southern end where several minor archaeological features were identified. The area evaluated was closer to the earthwork than indicated on the WSI due to the presence of the existing tarmac car park to the police station. Whilst the north eastern side of this trench was located less than 2m from the edge of the bank this presented no threat to any buried archaeology, the methodology being to stop as soon as any archaeological levels were encountered.

Results

5.4 The evaluations were monitored by Louise Mees, Cadw and me when the trenches had been opened to their full extent. The results are set out in Cotswold Archaeology report no. 6971-1 (May 2019) and are summarised below.

5.5 Access Road (Trenches 1-3) - the three trenches revealed extensive modern disturbance, probably associated with the construction of the car park and access road. Trench 3 downhill to the east contained only modern made-up ground. The central of the three trenches (2) revealed a deposit (201) cut into natural substrate (202) which contained material broadly contemporary with the monument and likely to be related to its construction or use. This deepened or sloped downwards towards the southern end of the trench but was not visible in the northern elevation towards the proposed widening of the road. Whilst the exact relationship of this deposit to the earthwork is unclear Trench 2 has clearly indicated the presence of archaeology associated with the monument. An apparently re-deposited natural deposit (101) in Trench 1 is also likely to be related to construction of the southern bastion. This extended beyond the confines of the trench to the north. Although the exact relationship of the deposit to the monument is unclear, Trench 2 has confirmed the presence of related archaeology, potentially extending northwards into the area affected by the proposed road widening.

5.6 Car Parking (Trench 4) - in spite of its proximity to the outer lip of the ditch of the monument, Trench 4 revealed no signs of a counterscarp, any former extension of the ditch to the south-west or any other outworks deposits associated with the Bulwarks. Abundant modern material within both topsoil and a considerable depth of subsoil indicated extensive modern disturbance across this area, probably associated with the construction of the police station. A series of pits and linear

features were identified and investigated at the southern end of the trench. Of these, two shallow gullies (405, 413) running beyond the confines of the trench towards the ditch to the north-east are undated but are likely to pre-date the Bulwarks, the report presenting the likely conclusion that they may be agricultural features or boundaries. I agree with the conclusion that several small undated pits in this area are likely, from their profile or the nature of their fills, to be of modern or natural origin. No archaeological levels were encountered at the northern end of the trench, which was excavated to below the level that would be affected by the construction of the car park. The earlier gullies were protected with geotextile to protect them during any future construction works.

6. Assessment

6.1 My advice relates solely to the direct physical and aesthetic (visual and setting) impacts of the elements of the scheme that fall within the scheduled area (ie the widening of the access road, the car parking spaces to the north-west and landscaping). Setting issues associated with the broader scheme have also been subject to separate comment to Carmarthenshire County Council in response to its consultation on the application for planning permission. The views below are based upon the results of the Cotswold Archaeology Heritage Impact Assessment and Archaeological Evaluation reports, and Cadw's inspection of the open evaluation trenches, taking into account additional comments made by Carmarthen Civic Society and other members of the public. I have also assessed the potential impacts of the different elements of the scheme against conservation values (evidential, historical, aesthetic and communal) set out in Conservation Principles (Cadw, 2011).

Historical Values

6.2 In my view the proposed scheme will have no impact on the historical value of the monument, which will remain unchanged.

Evidential Values

6.3 *Access road and southern bastion* - the main evidential values of the southern bastion are in its rare survival, buried archaeology and overall relationship to the other extant elements of the monument rather than its present truncated and altered form. It has been separated from the rampart to the north by the existing access road to the site, the construction of which has substantially levelled the junction between the two earthworks obscuring their exact relationship and layout. Near the base of the road cutting on what now forms the lower northern slopes of the southern bastion, a service run cuts through the earthwork and is likely to have destroyed any vestigial remains of the monument on this line.

6.4 These services and the pavement at road level prevented evaluation of the exact strip affected by the proposed road widening. However, Trenches 1 and 2 on the crest of the adjacent bank immediately to the south have confirmed the presence of archaeological deposits likely to be associated with the construction or use of the southern bastion. Of these, only the northern edge of Trench 2 is to be marginally cut by the proposed widening, which could potentially impact on any vestigial continuation of deposit 201 to the north, although the section shows this deposit

deepening in the opposite direction. Re-deposited natural material in Trench 1 extended northwards towards the affected area, albeit several metres away and in an almost level area where relatively limited landscaping is required. In contrast, uniformly modern material in Trench 3 has clearly demonstrated that no significant archaeological deposits are likely to be affected by the widening of the road to the east.

6.5 The existing breach for the access road, the service run on its southern side, modern build up in Trench 3 and the orientation away from the breach of deposit 201 in Trench 2 indicate extensive modern disturbance in this area and that the present profile of the bank does not reflect the original form of the bastion.

6.6 The proposed road widening is therefore unlikely to affect any significant in situ archaeological deposits on the line of the existing road and service run but there is some potential for a continuation of deposit 201, or related deposits at the northern extremity of Trench 2, on the slope between the trench and the service run. This can be avoided by reducing the limit of road widening by 1m to the north of this trench. The applicant will need to agree in writing with us the east-west extent of this reduction. Any minor impacts on vestigial remains nearer the base of the existing breach can be mitigated by an archaeological watching brief on all outstanding ground disturbing works in this area.

6.7 The impact of the proposed widening on the overall layout of the site also needs to be considered. In addition to the aesthetic impact (see below) of further separating the southern bastion from the rest of the monument, this proposal will potentially further obscure the form of the bastion. However, the existing breach, service run and evidence from the three evaluation trenches indicates that its present profile is a modern one. In my view, if mitigated by a slight adjustment to avoid the northern end of Trench 2 such changes will be incremental and will not affect any understanding of the overall layout or form of the monument.

6.8 *Car Parking* - the area affected by the proposed car parking forms almost level ground, sloping very slightly from north to south, a few metres to the south-west of the ditch to the main rampart. This is on a level with the existing police station car park and it has been presumed that this partly open, relatively flat area generally corresponds to the original Civil War topography of the site forming a field of fire outside of the defences.

6.9 Evaluation Trench 4 extended the length of the affected area, offset towards the ditch due to the existing tarmac surface. A consistent layer of modern disturbance or landscaped soil visible for the full N-S length of the trench was shown by the east to west (short) sections to extend away from the edge of the ditch at a consistent level. There was no evidence of a counterscarp bank or of any other earthworks or features associated with the construction or use of the monument (presumably the result of landscaping associated with the creation of the present car park). The undated early features identified in the base of the trench have been marked and protected by geotextile and will not be physically affected. I am therefore satisfied that no significant buried archaeological features or deposits will be affected by the construction of the car park.

6.10 Claims by third parties that the car park will destroy vestiges of a counterscarp bank and other upstanding earthwork remains associated with the monument also need to be addressed. The evaluation trench has comprehensively demonstrated that no such remains have survived, the present topography of the monument and the open space retained in front of it being the product of modern landscaping. The level of the open ground in front of the monument will not be significantly changed by the introduction of the parking area, although it will be altered aesthetically from grass to a parking surface (see below).

6.11 In my view the proposed parking area will therefore have a negligible impact on the evidential value of the monument. I recommend that any outstanding interventions into this area are covered by a watching brief.

6.12 *Hoop barriers* - A series of low hoop barriers are proposed to define the boundary between the north-eastern edge of the car park extension and the monument and prevent parking on the earthwork. These have the potential to further impact upon the scheduled monument and should be located within the strip already evaluated and not into undisturbed ground.

6.13 *Landscaping* - The Landscape Methodology document mentions, but does not take into account, the archaeological sensitivities of the earthworks of the scheduled monument, which are referred to as '*the relatively flat area facing A4242*' (southern bastion) and '*the east dipped area between the building and the treeblock*' (main rampart). It includes a proposal for a series of 2m wide, scarified and cultivated strips running along the grassed earthworks of the main rampart and ditch and across the southern bastion. These are to be refilled with soil and reseeded.

6.14 I consider that this method is entirely unnecessary for an area already maintained as grass and will entail additional ground disturbance/damage to the archaeologically sensitive surface of the earthworks. I further consider that this element of the proposal is inappropriate for a scheduled monument and consent should not be given. I do however welcome the forward plan for the regular mowing and maintenance of the monument presented in the same document. Those responsible for the monument should establish contact with Cadw as we would be pleased to provide advice about the future management of the monument.

6.15 *Planting* - the landscape plans show a small area of planted beds at the north western end of the scheduled area and hedging adjacent to the southern bastion. These will potentially damage any previously unexplored sub-surface archaeological deposits through cultivation and root damage, and interrupt the open ground in front of, and views towards, the monument from the car park. There should be no such encroachment into the scheduled monument and no planting should be permitted.

6.16 *Signage* - plans show a 'totem' style sign within the scheduled area on the north-western corner of the southern bastion and this element of work has been withdrawn from the application and should not therefore be approved.

Aesthetic Values

6.17 *Access Road* – the issues here are primarily twofold. Firstly, the widening of the access road to the south by over 3m will increase the existing modern breach in the earthworks of the monument, creating a greater visual divide between the upstanding earthworks of the southern bastion and the main rampart. Secondly, it will also alter the existing profile of the northern bank of the bastion.

6.18 However, other than its overall location and scale it is generally accepted that the southern bastion has been considerably altered since it was first recorded, probably during the construction of the police headquarters. The road cutting, the service run through the lower slopes of the earthwork and the evidence from the archaeological evaluation have demonstrated that the present form of the northern bank of the bastion is the result of previous landscaping, its exact original line and profile being unknown.

6.19 The road widening will result in a change to the present appearance of this area of the monument but in my view this will be an incremental and localised change and will have a minor adverse impact on its aesthetic value. As such it will not significantly alter the overall form of the bastion or the layout of the monument as a whole, and will simply result in the replacement of one modern bank profile with another.

6.20 I recommend that these impacts can be partly mitigated by a reduction in the width of the proposed widening by 1m to the north, as suggested in paragraph 6.6. This will avoid the crest of the present bank and vestigial deposits identified towards the northern end of evaluation Trench 2. The applicant will need to agree with Cadw in writing the east-west extent of this reduction.

6.21 *Car parking* - this proposal will see the retention of the open ground in front of the main ditch and rampart at the same level but a reduction of the current grassed area to a line approximately 2.5m (measured from site plan) from the outer lip of the ditch. A minor degree of north to south levelling will be undertaken and a low discontinuous series of hoop barriers are to be set along the edge of this area to prevent encroachment onto the monument

6.22 This will in my view have a slight adverse impact on the setting of the monument by reducing the grassed 'buffer' between it and the development, enabling parked cars to periodically intrude into views of and from the earthwork, a vehicle length closer than is possible at present. The hoop barrier will form a visual divide between the monument and the ground in front of it, albeit a low and interrupted one.

6.23 However, the surviving earthworks of the monument will remain intact, the archaeological evaluation having demonstrated that the affected ground surface in front of the ditch is the result of modern landscaping and no upstanding earthworks are present in this area. As such, the proposed parking will not in my view alter the present layout, form or any understanding of the monument beyond a change in use for a previously landscaped area of ground, which will be retained at the same level.

I recommend that the visual impact of the extension should be mitigated by the use of a more aesthetically sensitive material such as grasscrete.

Communal values (General)

6.24 Whilst I acknowledge the comments submitted by the objectors that the monument should be presented as a tourist attraction or public open space, this advice relates solely to the scheme presented for this application. It is a matter for the owner to decide if they would prefer the alternative that is suggested by the objectors. In my opinion, the slight impact of the proposed scheme on the aesthetic values of the monument will potentially have a corresponding impact on its communal value by altering the way in which it is experienced. However, this will be offset by the fact that the overall appearance and layout of the monument will essentially remain unchanged and there is a management plan for its ongoing maintenance. Beyond the elements of the scheme included within this application, the broader development also offers opportunities to improve access and install on-site interpretation highlighting the national significance of the Bulwarks for the benefit of visitors and shoppers. This could potentially be linked to other points of interest in the town such as the castle.

7. Conclusions

7.1 Car parking - I recommend that scheduled monument is approved for the proposed car parking within the scheduled monument subject to the recommended conditions set out in section 8.

Reason - the archaeological evaluations have demonstrated that this element of the scheme will have no physical impact on any significant buried archaeological deposits or upstanding earthworks associated with the construction and use of the monument. The features which pre-date the monument, identified during evaluation, are not to be affected and will be retained in situ. I recommend conditions as set out below for a watching brief to cover any outstanding minor interventions and for the footings of the proposed hoop barrier not to be located within undisturbed ground. Minor aesthetic impacts on this area of the monument can be mitigated by a more sensitive choice of surfacing such as grasscrete.

7.2 Access road widening - I recommend that scheduled monument consent is approved for a widening of the access road but with an reduction of its width by 1m to the north of evaluation Trench 2 (east to west extent to be agreed). This will avoid clipping significant archaeological deposits identified at the northern end of the trench and any possible continuation of these or related deposits within the narrow, unevaluated area on the upper slopes of the bank between the trench and the service run. This will also retain the crest of the present northern earthwork bank of the southern bastion.

Reason: The breach for the existing access road, the service run in the base of the northern earthwork bank of the southern bastion, and the evidence Trench 3 of the archaeological evaluations demonstrate extensive modern landscaping and the likely destruction of significant archaeological deposits over most of the area of the proposed road widening.

However, evaluation Trench 2 indicated the survival of significant archaeological deposits, probably related to the construction or use of the southern bastion at and immediately south of the limit of the proposed widening, which would clip the northern end of the trench. In my professional opinion there is potential for these, or related deposits, to extend into the narrow, unevaluated strip on the upper slopes of the bank to the north of the trench. The proposed minor reduction in width will therefore avoid deposits at the northern end of the trench and any continuation of these beyond its limits. Conditions are set below for a watching brief to cover any outstanding minor interventions into the base of the existing breach currently containing service runs.

Reason: This will retain the crest of the present upstanding earthwork bank to the south of the existing road breach and will therefore reduce the visual separation of the southern bastion from the remainder of the monument

7.3 Landscaping and planting - I recommend that scheduled monument consent is refused for the proposed scarification and improvement works to the earthworks of the monument, and for the areas of planting indicated in the landscape methodology and plan.

Reason: Unnecessary physical disturbance/damage to upstanding earthworks and potential to disturb near surface archaeology. This element of the scheme is out of character with the military / defensive purpose of the earthworks where, for example, clear lines of sight are a critical factor.

8. Proposed Conditions

8.1 The proposed conditions are intended to protect the monument from damage or significant alteration as set out in *TAN 24 : The Historic Environment*.

8.2 The applicant shall afford access at all reasonable times to any Cadw official or archaeologist nominated by Cadw to monitor progress of the works. Cadw shall be given two weeks written notice (e-mail notification is acceptable) in order for its representatives to monitor on site activity.

8.3 With the exception of the required adjustments and alterations set out later in the conditions, works shall be carried out strictly in accordance with the following approved plans and documents listed below. No variations from these plans and documents are permitted unless they have been authorised in advance in writing by Cadw.

Number	Document / plan	Reference (where applicable)	Date
1	Application for scheduled monument consent signed by Wendy Hurst		18/05/2018
2.	Cotswold Archaeology Heritage Assessment (updated)	Cotswold Archaeology report 18170	23/05/2018

3	Advice note on amended layout	CA 6579	20/12/2018
4	Cotswold Archaeology information provided with amended class 7 request (Car park layout)	CA drawing 6579	25/03/2019
5	Typical external works details (car park)	SP-04	26/03/2019
6	Cotswold Archaeology Evaluation Report (revised)	CA Report 6791-1	15/05/2019
7	Site plan, latest version	5872BR 00 00 DRA 900100	05/17/2019
8	Landscape proposals plan	173-2018./83 Rev H	09/2018
9	Landscape methodology and 5 year aftercare	2 nd February 2019	02/02/2019

8.4 The area of the car park extension within the scheduled area shall be surfaced with grasscrete or some similar sympathetic surface to reduce the aesthetic impact of the car park on the monument. Cadw must approve in advance a material proposed by the applicant.

8.5 The hoop barriers at the edge of the car parking area shall be located within the footprint of the previously evaluated area and not within previously undisturbed ground within the scheduled area unless agreed otherwise with Cadw.

8.6 The widening of the access road shall be reduced by a width of 1m adjacent to evaluation Trench 2 in order to avoid impact on archaeological deposits observed at the northern end of the trench, any continuation of these to the north, and the crest of the upstanding northern bank of southern bastion. Cadw must agree in writing the east-west extent of the proposed reduction.

8.7 No signs, posts, barriers or any other related furniture shall be located within the scheduled area unless otherwise approved in writing by Cadw.

8.8 There shall be no planting of trees, shrubs or hedges within the scheduled area as set out in the Landscape Proposals document.

8.9 No ground-disturbing landscaping measures (scarification, cultivation) shall be undertaken within the scheduled area.

8.10 Temporary fencing shall be erected to protect all areas of the monument unaffected by the proposed development during the course of works. This shall not disturb the ground in any way i.e. Herras fencing or some similar product supported on concrete feet.

8.11 There shall be no vehicle or machine tracking, parking or the storage of materials within the scheduled areas during the course of works.

8.12 No works, including site clearance, shall commence until Cadw has been informed in writing of the name of an appropriately qualified and experienced archaeological contractor who is to be present during the undertaking of any outstanding excavations within the scheduled area so that a watching brief can be conducted.

8.13 No works shall commence until Cadw has approved a written scheme of investigation (WSI) for the watching brief. A digital copy of the watching brief report shall be submitted to Cadw for approval within one month of the archaeological fieldwork being completed.

8.14 All staff, contractors and subcontractors shall be given a toolbox talk at the start of works by the appointed project archaeologist on the scheduled status of the site and the sensitivities and restrictions that this carries with it.

8.15 Cadw's representative shall be invited to attend a start of works site meeting to review the programme, submitted method statement and arrangements that have been established for archaeological mitigation. This meeting will also establish an appropriate monitoring regime for the duration of the project.

8.16 Any historic or archaeological features (not previously identified) which are revealed when carrying out the works shall be retained *in-situ* and reported to Cadw within two working days. Works shall be halted in the area/part of the site affected until provision has been made for retention and/or recording of the feature by a suitably qualified archaeologist in accordance with details submitted to and approved in writing in advance by Cadw.

8.17 The applicant shall discuss with Cadw opportunities for site interpretation to inform shoppers and visitors of the monument's significance. Cadw would be pleased to advise on the content of any such interpretation and must approve its location.

Name of Inspector: Will Davies

Date: 19/06/2019

