



Llywodraeth Cymru
Welsh Government

Welsh Government
Ty'r Afon,
Heol Bedwas/ Bedwas Road
Caerffili/ Caerphilly
CF83 8WT
0300 025 6000
cadw@gov.wales/cadw@llyw.cymru
www.cadw.gov.wales

Claudine Gerrard
National Trust Wales
Priest House
Tredegar House
Newport
South Wales
NP10 8YW

Eich cyfeirnod
Your reference

CM208

Ein cyfeirnod
Our reference

DH

Dyddiad
Date

10 September 2021

Llinell uniongyrchol
Direct line

0300 0256004

Ebost
Email:

scheduledmonuments@gov.wales

Dear Ms Gerrard,

**ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979
APPLICATION FOR SCHEDULED MONUMENT CONSENT
DOLAUCOTHI GOLD MINES (CM208)**

1. Introduction

1.1 Thank you for your application of 15 April 2021 to Cadw for scheduled monument consent for:

- i) Fencing: –
 - a. Fence at entrance to lower Roman adit - post and rail approx. 3m
 - b. Fence at entrance to Ogof Fawr - post and rail approx. 3m
 - c. Fence at entrance to rear of mine office - post and rail approx. 5m
- ii) Barring tests / descaling:-
 - a. Barring test and descale. Exit to Upper Roman: rock face above the exit steps as identified in G Daws 2021 report (pp 3-4).
 - b. Barring test and descale. Mitchell Adit (loose areas on right hand side upper sidewall inside the portal) as identified in G Daws 2021 report (pp 5-6)
 - c. Barring test and descale. Long Adit (RHS of portal) as identified in G Daws 2021 report (p 1).

at the above scheduled monument.

1.2 Cadw is a Department within the Welsh Government that undertakes the statutory functions of the Welsh Ministers in determining applications for scheduled monument consent.

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



1.3 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 supporting documentation has been assessed by our Regional Inspector of Ancient Monuments who has recommended that conditional scheduled monument consent should be approved for

(i) Fencing:

- a. Fence at entrance to lower Roman adit - post and rail approx. 3m
 - b. Fence at entrance to Ogof Fawr - post and rail approx. 3m
 - c. Fence at entrance to rear of mine office - post and rail approx. 5m
- 1.8m long x 125mm x 75mm fence posts sunk at approximately 1.8 metre intervals, and to a maximum depth of 600mm. Rails 3.6m long x 88mm x 38mm.

(ii) Barring tests / descaling:

- a. Barring test and descale. Exit to Upper Roman: rock face above the exit steps as identified in G Daws 2021 report (pp 3-4).
- b. Barring test and descale. Mitchell Adit (loose areas on right hand side upper sidewall inside the portal) as identified in G Daws 2021 report (pp 5-6)
- c. Barring test and descale. Long Adit (RHS of portal) as identified in G Daws 2021 report (p 1).

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 our Regional Inspector of Ancient Monuments. 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 works as outlined in section 1.1.

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. 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. Any development control issues associated with wider development will be a matter for any application for planning permission. It is the responsibility of the

applicant to establish whether any further approval or consents are required for the proposed development.

4. Proposed Conditions

4.1. The following proposed conditions are intended to protect the monument from damage or significant alteration as set out in TAN 24: *The Historic Environment* and to ensure that details of the project are archived.

- a) The applicant shall provide Cadw with reasonable advance notice of commencement of works on site and shall afford access at all reasonable times to any Cadw official or archaeologist nominated by Cadw to monitor progress of the works;
- b) The approved works shall be carried out strictly in accordance with the application form, plans and documents as listed below. No variations are permitted unless they have been authorised in advance, in writing by Cadw;

| Number | Document / plan | Reference Number (if applicable) | Date |
|---------------|--|---|-------------|
| 1 | SMC application form signed by Claudine Gerrard and dated 14/04/2021 | | 28/04/2021 |
| 2 | Statement of Significance and assessment of descaling impact | | 28/04/2021 |
| 3 | Standard Recording Methodology for barring Dolaucothi Goldmine CM208 | | 28/04/2021 |
| 4 | Location of proposed works and photographs | | 28/04/2021 |
| 5 | Additional information re fencing | | 21/07/2021 |

- c) The approved works shall be carried out strictly in accordance with a 'Method Statement' to be submitted in advance and formally approved in writing by Cadw before work commences. The 'Method Statement' shall be adhered to throughout the project and any variations shall be approved by Cadw prior to works commencing;
- d) The Method Statement shall provide for:

| | INFORMATION REQUIRED | Date when information required |
|---|--|---------------------------------------|
| 1 | Rope access barring tests and descaling | Before work commences. |
| 2 | Reflective Transformation Imaging, interpretation and reporting. | Before work commences. |

- e) Fencing posts shall be driven into the ground wherever possible. Where the ground proves too rocky, receiver pits may be excavated;
- f) No works, including site clearance, shall commence until Cadw has been informed in writing of the name of an appropriately qualified archaeologist operating to ClfA published standards and guidance¹ who is to be present to undertake a watching brief for excavation of fence receiver pits within the scheduled area. No work shall commence until Cadw has confirmed in writing that the proposed archaeologist is acceptable;
- g) A digital copy of the draft watching brief report shall be submitted to Cadw for approval within 8 weeks of the archaeological fieldwork being completed²;
- h) A digital copy of the approved watching brief report shall be submitted to the regional Historic Environment Record and National Monuments Record of Wales to be incorporated into these public records³, and the applicant shall inform Cadw when this has been completed;
- i) A digital copy of the approved archaeological report shall be submitted to the regional Historic Environment Record and National Monuments Record of Wales to be incorporated into these public records⁴;
- j) That upon completion of the project the applicant shall produce a completion report including a measured plan showing the location of areas worked upon, Reflective Transformation Imaging record and associated interpretation, and an annotated photographic record detailing the site before, during and after works took place. The draft should be sent to Cadw in digital format for approval within 25 working days of the works being completed; and
- k) 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

¹ Chartered Institute for Archaeologists <https://www.archaeologists.net/codes/cifa> .

² Cadw will retain a copy of the watching brief report for our records.

³ Cadw requires formal confirmation of report deposit to discharge condition.

⁴ Cadw requires formal confirmation of report deposit to discharge this condition.

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.

5. Compliance

5.1. Where a condition requires approval or any contact with Cadw you are advised to contact Louise Mees by email scheduledmonuments@gov.wales.

5.2. When all work has been completed and the conditions have been discharged, please complete and return the 'completion notice' at **Annex B** to Cadw. 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 (i.e. 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,

Denise Harris

Casework Manager

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

Dolaucothi Gold Mines CM208

INSPECTOR'S ADVICE

1. Policy Context

- 1.1 An application for scheduled monument consent (SMC) 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 SMC, 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. Dolaucothi Gold Mines

- 2.1 The monument consists of the remains of a gold mine, dating initially to the Roman period (1st to 4th century AD), but with further phases of activity, of which those in the later 19th and early 20th century are best attested. The main focus of the mines lies in and around a saddle on the northern slopes of a range of hills running north-east to south-west, known as Allt Ogofau to the south-west of the mines and Allt Cwmhenog to the north-east. The most obvious feature here is a large opencast working, within which the various features of the present day visitor centre are housed. This opencast is likely to be of Roman date and was originally at least 10m deeper than at present, with passages leading into underground workings at its base. Further opencast workings, trenches and adits are visible at various points along the hills to either side of the main opencast, running altogether for a total of about 1km. The early

workings were fed with water by at least one and probably more aqueducts, the main one of which ran 11km down the Cothi valley from Pwll Uffern Cothi (scheduled as CM200). Various features around the mine area have been postulated as related to the use of this water for different mining and processing activities. The most obvious are two tanks at the lower end of the main aqueduct, which lie to the east of the Caio road; the waste water would have flowed away southwards from here. Crushed material which probably relates to early exploitation extends widely across the floodplain to the north-west of the workings, and the 'Carreg Pumsaint', a rectangular stone with hollows along its sides, is likely to have been used in the crushing process.

The modern phases of mining were focused below and to the east of the main opencast, with adits driven into the hillside at two points (later linked by a vertical internal shaft) and underground workings leading off a shaft in the main opencast area. Three different foci of processing were used; the earliest lay on the hillside to the east of the main opencast, the second in the south-eastern corner of the opencast itself, while that used in the final phase in the 1930s was constructed on the hillside to the south, near Pen-lan-wen, and reached by an incline from the shaft area. Tailings from this phase were deposited to the south of the workings and would have drained to the south-east.

The monument is of national importance for its potential to enhance our knowledge of Roman mining practices. The more recent phases are also of historical interest. It retains significant archaeological potential, with a strong probability of the presence of associated archaeological features and deposits.

The areas subject to this application are owned and managed by the National Trust and include the entrance to the lower Roman adit, the entrance to Ogof Fawr, the rear of the mine office, the exit to the Upper Roman adit, and the Mitchell and Long Adit.

The heritage values of these areas are summarised below:

Evidential value:

Dolaucothi Gold Mines is the only known example of a Roman gold mine in Britain. These nationally unique remains are also of international significance. The entrance and exit areas to the lower Roman adit and Ogof Fawr were worked during the Roman period and constitute physical remains (evidential value) from this period. The mine office is located within the large open cast working of likely Roman date. Though the opencast area has been backfilled and the Roman remains are potentially 10m lower than the present ground surface the area behind the mine office is located above this infill and potentially contains archaeological features and deposits associated with Roman mining. Mitchell and Long Adit are 19th and 20th century workings. Though the latter may have incorporated Roman workings it is likely that these were destroyed by modern activity.

Historic Value:

A well preserved example of a Roman gold mining complex associated with the nearby Roman fort, documented by the Romans, which demonstrates Roman technology and the impact of the Roman conquest on Wales. Subsequent

modern phases of mining in the 19th and 20th centuries reflects the viability of the mine, ownership and academic interest.

Aesthetic Value:

The unique and well preserved below ground features and above ground industrial landscape enable visitors to understand and appreciate Roman and modern mining activity at the site.

Communal Value:

The monument, located within a publicly accessible National Trust property, is well visited by the local community and tourists. Dolaucothi Gold Mines is a popular destination and brings economic benefits to the local community.

3. The Application

3.1 This application for scheduled monument consent involves:

(i) Fencing:

- a. Fence at entrance to lower Roman adit - post and rail approx. 3m
 - b. Fence at entrance to Ogof Fawr - post and rail approx. 3m
 - c. Fence at entrance to rear of mine office - post and rail approx. 5m
- 1.8m long x 125mm x 75mm fence posts sunk at approximately 1.8 metre intervals, and to a maximum depth of 600mm. Rails 3.6m long x 88mm x 38mm.

(ii) Barring tests / descaling:

- a. Barring test and descale. Exit to Upper Roman: rock face above the exit steps as identified in G Daws 2021 report (pp 3-4).
- b. Barring test and descale. Mitchell Adit (loose areas on right hand side upper sidewall inside the portal) as identified in G Daws 2021 report (pp 5-6)
- c. Barring test and descale. Long Adit (RHS of portal) as identified in G Daws 2021 report (p 1).

4. Assessment

4.1 The applicant has developed a programme of work following advice from HM Inspectorate of Mines, structural survey and in consultation with

Cadw's regional Inspector of Ancient Monuments and Archaeology. The National Trust's archaeologist has submitted plans, photographs of the areas affected by the proposed works as existing, a statement of significance and assessment of the impact of descaling and a proposed recording methodology.

The proposed fencing works are required for health and safety reasons to prevent access to adits or enable safe access up steps. The applicant proposes to knock fence posts into the ground, in which case damage may potentially occur to subsurface remains. However, this damage will be highly localised and outweighed by H&S benefits. Knocking fence posts into the ground may not be possible due to the rocky nature of the site, in which case small post holes will be dug, posts inserted and packed with the excavated material. Excavation of post holes will result in a slightly larger area of impact and will require a watching brief to minimise the impact on scheduled remains.

Cadw records, prior to 2011, show agreement between Cadw and the National Trust that 'Barring and descaling' works i.e. 'light removal of rock for general maintenance purposes' could be undertaken at Dolaucothi without scheduled monument consent. The agreed work was undertaken with light hand tools and the areas affected photographed. Following consultation with Cadw in 2012 work it was agreed that barring tests/ descaling could be undertaken at the entrance to the upper Roman adit, around the exit of Mitchel adit, and around the entrance to Middle adit. Barring tests and descaling work continued to be undertaken without scheduled monument consent until 2019.

Following consultation with Cadw in 2020 it was agreed that the extent and impact of previous work, the methodology and recording of barring and descaling works should be reviewed and a formal application submitted for scheduled monument consent.

The statement of significance provided by the National Trust details the safety recommendations made following structural survey, timeline of key events, heritage values, assessment of significance of underground workings, and a review of ancient workings and potential for surviving evidence.

The areas of proposed barring/descaling related to this application are the exit to the Upper Roman Adit (adjacent to the exit steps), Mitchel Adit and Long Adit.

The works will result in loss of material and affect the appearance of the monument, however this impact is in keeping with the long term natural degradation of this type of environment and have a negligible adverse impact upon the aesthetic values of the monument.

Exit to Upper Roman: rock face above the exit steps as identified in G Daws 2021 report (pp 3-4). Although the adit has medium/high potential for survival of ancient workings the exit area has previously been descaled. In comparison with the photograph included in the 2012 WPS (page 8) it can be seen that this area has suffered loss of material and is unlikely to retain surviving archaeological features. Therefore proposed works are unlikely to affect archaeological features. The impact can be mitigated by recording the location of works and creation of a photographic record.

Barring test and descale. Mitchell Adit (loose areas on right hand side upper sidewall inside the portal) as identified in G Daws 2021 report (pp 5-6). This area has low potential for survival of ancient workings and has previously been descaled. The proposed works may have an adverse impact upon archaeological features (evidential and aesthetic values) of the monument. Negative impacts can be mitigated by undertaking Reflective Transformation Imaging in advance of barring tests / descaling, recording the location of works, and maintaining a photographic record.

Long Adit (RHS of portal) as identified in G Daws 2021 report (p 1). This area has low potential for survival of ancient workings and has previously been descaled. The proposed works may have an adverse impact upon archaeological features (evidential and aesthetic values) of the monument.

Negative impacts can be mitigated by undertaking Reflective Transformation Imaging in advance of barring tests / descaling, recording the location of works, and creating a photographic record.

The proposed works are required to maintain the integrity of the scheduled mine workings (as recommended by HM Inspectorate of Mines) to enable access for routine maintenance and for safe public access. The fencing works are uncontentious and will cause minimal negative impact to the significance of the monument. Barring tests and descaling works have been ongoing and are potentially harmful to archaeological remains. Formalising these works and ensuring appropriate recording will mitigate immediate potential negative impacts and enable long-term impacts to be understood and reviewed.

5. Recommendation

- 5.1 I recommend that scheduled monument consent is given, subject to the following conditions:

6. Proposed Conditions

- 6.1 The applicant shall provide Cadw with reasonable advance notice of commencement of works on site and will afford access at all reasonable times to any Cadw official or archaeologist nominated by Cadw to monitor progress of the works.
- 6.2 The approved works shall be carried out strictly in accordance with the application form, plans and documents as listed below. No variations are permitted unless they have been authorised in advance in writing by Cadw.

| Number | Document / plan | Reference Number (if applicable) | Date |
|---------------|--|---|-------------|
| 1 | SMC application form signed by Claudine Gerrard and dated 14/04/2021 | | 28/04/2021 |
| 2 | Statement of Significance and assessment of descaling impact | | 28/04/2021 |
| 3 | Standard Recording Methodology for barring Dolaucothi Goldmine CM208 | | 28/04/2021 |
| 4 | Location of proposed works and photographs | | 28/04/2021 |
| 5 | Additional information re fencing | | 21/07/2021 |

- 6.3 The approved works shall be carried out strictly in accordance with a 'Method Statement' to be submitted in advance and formally approved in writing by Cadw before work commences. The 'Method Statement' shall be adhered to throughout the project and any variations shall be approved by Cadw prior to works commencing.

6.4 The Method Statement shall provide for:

| | INFORMATION REQUIRED | Date when information required |
|---|--|--------------------------------|
| 1 | Rope access barring tests and descaling | Before work commences. |
| 2 | Reflective Transformation Imaging, interpretation and reporting. | Before work commences. |

- 6.5 Fencing posts shall be driven into the ground wherever possible. Where the ground proves too rocky receiver pits may be excavated.
- 6.6 No works, including site clearance, shall commence until Cadw has been informed in writing of the name of an appropriately qualified archaeologist operating to ClfA published standards and guidance⁵ who is to be present to undertake a watching brief for excavation of fence receiver pits within the scheduled area. No work shall commence until Cadw has confirmed in writing that the proposed archaeologist is acceptable.
- 6.7 A digital copy of the draft watching brief report shall be submitted to Cadw for approval within 8 weeks of the archaeological fieldwork being completed⁶.
- 6.8 A digital copy of the approved watching brief report shall be submitted to the regional Historic Environment Record and National Monuments Record of Wales to be incorporated into these public records⁷, and the applicant shall inform Cadw when this has been completed.
- 6.9 A digital copy of the approved archaeological report shall be submitted to the regional Historic Environment Record and National Monuments Record of Wales to be incorporated into these public records⁸.
- 6.10 That upon completion of the project the applicant will produce a completion report including a measured plan showing the location of areas worked upon, Reflective Transformation Imaging record and associated interpretation, and an annotated photographic record detailing the site before, during and after works took place. The draft should be sent to Cadw in digital format for approval within 25 working days of the works being completed.
- 6.11 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

⁵ Chartered Institute for Archaeologists <https://www.archaeologists.net/codes/cifa> .

⁶ Cadw will retain a copy of the watching brief report for our records.

⁷ Cadw requires formal confirmation of report deposit to discharge condition.

⁸ Cadw requires formal confirmation of report deposit to discharge this condition.

feature by a suitably qualified archaeologist in accordance with details submitted to and approved in writing in advance by Cadw.

Name of Inspector: Louise Mees

Date: 23/07/2021

COMPLETION NOTICE**Name of Monument: Dolaucothi Gold Mines****Monument Number: CM208**

| Conditions | Date | Signature |
|---|------|-----------|
| Completion of works on site | | |
| A digital copy of the draft watching brief report shall be submitted to Cadw for approval within 8 weeks of the archaeological fieldwork being completed. | | |
| A digital copy of the approved watching brief report shall be submitted to the regional Historic Environment Record and National Monuments Record of Wales to be incorporated into these public records, and the applicant shall inform Cadw when this has been completed. | | |
| A digital copy of the approved archaeological report shall be submitted to the regional Historic Environment Record and National Monuments Record of Wales to be incorporated into these public records | | |
| That upon completion of the project the applicant will produce a completion report including a measured plan showing the location of areas worked upon, Reflective Transformation Imaging record and associated interpretation, and an annotated photographic record detailing the site before, during and after works took place. The draft should be sent to Cadw in digital format for approval within 25 working days of the works being completed. | | |

Applicant Name:

Signature:

When all work has been completed and the conditions have been discharged, please complete and return this completion notice to Cadw at scheduledmonuments@gov.wales