

Kathryn Laws  
The National Trust

By email  
[Kathryn.laws@nationaltrust.org](mailto:Kathryn.laws@nationaltrust.org)

Eich cyfeirnod  
Your reference

Ein cyfeirnod  
Our reference

Dyddiad  
Date

Llinell uniongyrchol  
Direct line

Ebost  
Email:

CM208

19 December 2024

0300 0256004

[scheduledmonuments@gov.wales](mailto:scheduledmonuments@gov.wales)

Dear Kathryn Laws,

**HISTORIC ENVIRONMENT (WALES) ACT 2023  
APPLICATION FOR SCHEDULED MONUMENT CONSENT  
DOLAUCOTHI GOLD MINES (CM208) – SMC24-024**

## 1. Introduction

- 1.1 Thank you for your application of 8 July 2024 to Cadw for scheduled monument consent for a programme of bar sounding and de-scaling of any unsound rock proposed to take place monthly between March and October 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.
- 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 monuments of national importance 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 involves a 5-year programme undertaken by rock test engineers on an annual basis and by National Trust staff monthly during March - October of bar sounding,

and testing and descaling of any unsound rock within the publicly accessible areas of three adits: (i) Long Adit (ii) Mitchel's Adit and (iii) Upper Roman Adit. 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 Well-being of Future Generations (Wales) 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 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. Conditions

4.1 The following 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 will 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 Kathryn Laws on 08/07/2024		08/07/2024
2	Dolaucothi_CM208_safety works_2004_V2		08/07/2024
3	Email from applicant re timescale March-October five year period from 2025		20/11/2024
4	Methodology for recording descaling areas and archaeological features observed		25/11/2024

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:

	<b>INFORMATION REQUIRED</b>	<b>Date when information required</b>
1	Rope access if required	Before rope access work commences.

e) Cadw shall be invited attend a site meeting within the first 5 working days of commencement of the project in March of each year to review the programme, previous report, submitted method statement and arrangements that have been established for archaeological mitigation/recording in areas previously not subject to descaling;

f) That upon completion of each annual phase of the project the applicant will produce a completion report including a measured plan showing the location of areas worked upon by contractors and National Trust staff 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;

g) That upon completion of the 5-year project the applicant will produce a completion report including a measured plan showing the location of areas worked upon by contractors and National Trust staff 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

- h) 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.

## **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](mailto: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 30(2)(b) of the 2023 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 19(2) of the 2023 Act, if no works to which this consent relates are 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 13 of the 2023 Act. It is the responsibility of the applicant to obtain any such approval or consent where necessary.

## **6. Mechanism for Challenge**

- 6.1 Sections 72 and 73 of the 2023 Act explain 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 day after 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.
- 6.2 The 'relevant requirements' mentioned above are defined in Section 73(5) of the 2023 Act and it is advisable to seek legal advice before taking any action.
- 6.3 Should you have any queries please do not hesitate to contact me.



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

Yours sincerely,

Denise Harris  
Historic Environment Branch  
under authority of Jack Sargeant MS – Minister for Culture, Skills and Social Partnership



**HISTORIC ENVIRONMENT (WALES) ACT 2023**  
**DOLAUCOTHI GOLD MINES (CM208) – Bar sounding, testing and descaling**  
**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.

## 2.2 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 19<sup>th</sup> and 20<sup>th</sup> century workings. Though the latter may have incorporated Roman workings it is likely that these were destroyed by modern activity. Upper Roman Adit has a high evidential value for ancient workings.

### 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 19<sup>th</sup> and 20<sup>th</sup> 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.

- 2.3 The areas subject to this application are owned and managed by the National Trust and include Long Adit, Mitchel's Adit and Upper Roman Adit.

### **3. The Application**

- 3.1 This application for scheduled monument consent involves a 5-year programme undertaken by rock test engineers on an annual basis and by National Trust staff monthly during March - October of bar sounding, and testing and descaling of any unsound rock within the publicly accessible areas of three adits: (i) Long Adit (ii) Mitchel's Adit and (iii) Upper Roman Adit.
- 3.2 The applicant proposes that staff will walk the length of the adits shown on the plan submitted to accompany the application. The method statement submitted details how a metal bar will be used to strike the rock, the sound produced indicating whether the rock is sound or not.
- 3.3 Following a visual inspection and using the point of the bar to test for loose flakes, the applicant then proposes to remove any loose material until sound rock is reached.

### **4. Assessment**

- 4.1 The applicant has developed a programme of work following advice from HM Inspectorate of Mines, rock testing engineers 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.
- 4.2 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.
- 4.3 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 further work subject to scheduled monument consent.





- 4.4 Scheduled monument consent was granted in September 2022 for barring/descaling within the exit to the Upper Roman Adit (adjacent to the exit steps), Mitchel Adit and Long Adit.
- 4.5 This application for scheduled monument consent involves a programme of bar sounding, bar testing, and descaling of any unsound rock within the publicly accessible areas of three adits: (i) Long Adit (ii) Mitchel's Adit and (iii) Upper Roman Adit.
- 4.6 Bar sounding has low potential to harm ancient and historic features on sound rock.
- 4.7 Bar sounding, testing for unsound rock and descaling in unstable areas will result in loss of material and affect the appearance of the monument. In previously weathered or descaled areas this impact is in keeping with the long-term natural degradation of this type of environment and will have a negligible adverse impact upon the aesthetic values of the monument. Negative impacts can be mitigated by recording the location of works, providing dimension of the area of loss, and maintaining a photographic record.
- 4.8 Long Adit and Mitchel Adit: the SoS concludes that 19<sup>th</sup> and 20<sup>th</sup> century activity has destroyed ancient workings. Large areas within these adits have previously been descaled. Bar sounding, testing for unsound rock and descaling within Long Adit and Mitchel Adit has potential to damage historic features in areas previously unaffected by descaling.
- 4.9 Upper Roman Adit: the SoS concludes that this area has a high evidential value for ancient workings and that previous descaling has focussed on the exit to the mine. Bar sounding, testing for unsound rock and descaling within the Upper Roman Adit has potential to damage ancient and historic features in areas previously unaffected by descaling.
- 4.10 Harm to ancient or historic features in areas previously unaffected by descaling can be avoided / mitigated by undertaking archaeological monitoring and recording, which can be included as a condition of the scheduled monument consent with the addition of a stop clause.
- 4.11 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. Bar sounding, testing and descaling works have been ongoing and are potentially harmful to archaeological remains. Ensuring appropriate methods and recording will mitigate negative impacts of these activities and enable long-term impacts of this process to be understood and reviewed.
- 4.12 The monument is located within a SSSI. NRW has confirmed that they do not have any major concerns for the biological feature of the SSSI which is the Hay Scented Buckler Fern, and do not perceive any adverse impacts on the geological interest of the SSSI. NRW has advised the National Trust that the notified designated SSSI features are not bats and therefore the National Trust



will need to consider their obligations under the Habitat Regulations for European Protected Species before they start the work.

## 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 Kathryn Laws on 08/07/2024		08/07/2024
2	Dolaucothi_CM208_safety works_2004_V2		08/07/2024
3	Email from applicant re timescale March-October five year period from 2025		20/11/2024
4	Methodology for recording descaling areas and archaeological features observed		25/11/2024

- 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 if required	Before rope access work commences.



- 6.5 Cadw shall be invited to attend a site meeting within the first 5 working days of commencement of the project in March of each year to review the programme, previous report, submitted method statement and arrangements that have been established for archaeological mitigation/recording in areas previously not subject to descaling.
- 6.6 That upon completion of each annual phase of the project the applicant will produce a completion report including a measured plan showing the location of areas worked upon by contractors and National Trust staff 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.
- 6.7 That upon completion of the 5-year project the applicant will produce a completion report including a measured plan showing the location of areas worked upon by contractors and National Trust staff 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.
- 6.8 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.

Name of Inspector: Louise Mees

Date: 26/11/2024



## COMPLETION NOTICE

**Name of Monument: DOLAUCOTHI GOLD MINES**

**Monument Number: CM208**

Conditions	Date	Signature
Reasonable advance notice of commencement of works on site & access for Cadw		
The approved works shall be carried out strictly in accordance with the application form, plans and documents as listed.		
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.		
Cadw shall be invited attend a site meeting within the first 5 working days of commencement of the project in March of each year to review the programme, previous report, submitted method statement and arrangements that have been established for archaeological mitigation/recording in areas previously not subject to descaling;		
Upon completion of each annual phase, the applicant will produce a completion report including a measured plan showing the location of areas worked upon by contractors and National Trust staff 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;		
upon completion of the 5-year project the applicant will produce a completion report		



Any historic or archaeological features not previously identified which are revealed when carrying out the works shall be retained <i>in situ</i> and reported to Cadw within two working days.		
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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](mailto:scheduledmonuments@gov.wales)

