



**Land at Cefncaeau,
Llanelli**

**Archaeology and
Heritage Assessment**

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Executive Summary

- S1 This Archaeological and Heritage assessment has been prepared by The Environmental Dimension Partnership Ltd for Tata Steel, in order to inform and support planning proposals for a residential development of the Land at Cefncaeau, Llanelli.
- S2 This archaeological and heritage assessment concludes that the site does not contain any world heritage sites, scheduled monuments, registered historic parks and gardens or listed buildings and hence development of the site would not give rise to 'direct' impacts in that respect if the planning application is approved and implemented.
- S3 The historic and modern settings of each of the designated heritage assets within the study area have been assessed, and it is determined that the heritage significance of these assets would in no way be adversely affected by the form of development proposed within the site, either in terms of an effect on their physical form/fabric or through change to the contribution made by their setting.
- S4 There are no previously identified and recorded 'non-designated' archaeological features or remains within the site and so accordingly the proposals for residential development of the two fields of agricultural farmland forming the site would have no adverse impact on known archaeological remains.
- S5 Furthermore, based on the limited nature of the archaeological record in the wider study area, there is concluded to be no more than a '**low**' potential for previously unrecorded archaeological remains of significance to be present within the site, and with no reason to believe or expect that the site will contain archaeology of such significance that it might require preservation in situ.
- S6 The most likely archaeological features to be present within the site are medieval and later field boundaries and cultivation soils associated with its exploitation and management for agricultural production. These features, deposits and remains are assessed as being very unlikely to be of greater than 'low' interest or significance and there is deemed to be just a low potential for more significant archaeological deposits to be present within the site.
- S7 The proposed development is assessed as being unlikely to have a significant impact upon non-designated archaeological features, deposits or remains as: (a) there are no previously identified features or remains within the site; and (b) there is no more than a 'low' potential for hitherto unknown/unrecorded archaeological features or remains to be preserved within the site and adversely affected by construction groundworks.
- S8 In view of this low potential for the development to encounter significant archaeology during construction works, further investigation and recording is considered to be unwarranted and this desktop report should suffice to address and satisfy the planning process.
- S9 The site walkover and historic map evidence indicates that the field boundaries within the site may be of some antiquity because of the substantial banks. The Sketch Concept shows those around the edges of the site would be retained, but in contrast the central dividing hedgerow would be removed through the centre.

- S10 The loss of this central section of hedgerow is assessed as no more than a small impact and not one worthy of mitigation in view of the limited interest of this feature.
- S11 This assessment should provide sufficient information to positively determine a planning application when it is submitted. It is concluded that the proposed development accords with current legislation and the planning policies of PPW and the LDP.

Section 1

Introduction

- 1.1 This report has been drafted by The Environmental Dimension Partnership Ltd (EDP) for TATA Steel and presents the results of an Archaeological and Heritage Assessment Land at Cefncaeau, Llanelli (known as 'the site').
- 1.2 The assessment has been prepared to both inform and support the preparation of proposals for residential development within the site.
- 1.3 In order to do so, it addresses Welsh Government planning guidance in Planning Policy Wales Edition 11, Technical Advice Note 24 (TAN 24) and local planning policy in identifying and considering the available historical and archaeological resources for the site, in order to establish its archaeological interest or potential and to enable an assessment of the proposed development's impact in that regard.
- 1.4 In accordance with good practice and guidance, desktop sources have been augmented through the completion of a walkover survey, which in this case was undertaken at the start of September 2022.

SITE LOCATION, BOUNDARIES AND LAND USE

- 1.5 The site (which measures 4.08 hectares (ha) in extent) is located on the south eastern side of Llanelli, where it is centred on National Grid Reference (NGR) SS 533996 and bound to the west and east by existing field boundaries, to the north by a combination of a further field boundary and a Public Right of Way (PRoW) known as 'Erwlas' and to the south by the A484 main road (as illustrated on **Plan EDP 1**).
- 1.6 The site comprises two fields of permanent pasture, the one to the east grazed by horses and the one to the west ungrazed. The land is enclosed and sub-divided by overgrown field boundaries comprising (where accessible) low earthen banks topped with intermittent trees and shrubs and without stone revetment.
- 1.7 These hedgerows are now very overgrown and extend much further into the field margins than would historically or formerly been the case. The site's redline boundary does not take in any buildings or structures.

GEOLOGY AND TOPOGRAPHY

- 1.8 With regard to the underlying solid geology, the majority of the site is situated on mudstone, siltstone and sandstone of the Swansea Member, with Superficial deposits being recorded as Devensian Diamicton Till.
- 1.9 The site slopes gently downwards from the north to the south, from c.10m above Ordnance Datum (aOD) on the northern boundary by Erwlas to c.5m aOD on the southern boundary close to the edge of the main road (A484).

THE PROPOSED DEVELOPMENT

- 1.10 The development proposals are for residential development of up to 91 dwellings, vehicular access, open space and other associated infrastructure.
- 1.11 A plan showing the proposals for development of the site, which will be covered by an outline planning application, is included as **Appendix EDP 1**.

Section 2

Legislation and Planning Guidance

- 2.1 This section sets out relevant legislation and planning policy, governing the conservation and management of the historic environment.

LEGISLATION

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

Listed Buildings and Conservation Areas

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

- 2.4 Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* sets out the statutory duty of the decision-maker, where proposed development would affect a listed building or its setting:

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

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

- 2.6 Paragraph 5 of Lewison LJ in the Court of Appeal judgement covering *Regina (Palmer) v Herefordshire Council [2016] EWCA Civ 1061* (04 November 2016) covers this matter in detail when it identified that:

“Since section 66(1) requires that special regard must be paid to the desirability of preserving a listed building or its setting, this means that that desirability must be given considerable importance and weight: The Bath Society v Secretary of State for the Environment [1991] 1 WLR 1303, 1319. In this context the concept of preserving the building or its setting means doing no harm: South Lakeland District Council v Secretary of State for the Environment [1992] 2 AC 141, 150. Although the most obvious way in which the setting of a listed building might be harmed is by encroachment or visual intrusion, it is common ground that, in principle, the setting of a listed building may be harmed by noise or smell. The degree of harm (if any) is a matter of judgment for the decision-maker, but if the decision-maker decides that there is harm, he is not entitled to give it such weight as

he thinks. To the contrary he must give it considerable weight: *East Northamptonshire District Council v Secretary of State for Communities and Local Government* [2015] 1WLR 45, para 22. However, this does not mean that the weight that the decision-maker must give to the desirability of preserving the building or its setting is uniform. It will depend on, among other things, the extent of the assessed harm and the heritage value of the asset in question: *East Northamptonshire District Council*, para 28; *R (Forge Field Society) v Sevenoaks District Council* [2015] JPL 22, para 49. This is consistent with paragraph 132 of the *National Planning Policy Framework* (2012) (the *NPPF*) which states: When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be."

2.7 Paragraph 7 adds that:

"The existence of the statutory duty under section 66(1) does not alter the approach that the court takes to an examination of the reasons for the decision given by the decision-maker: *Mordue v Secretary of State for Communities and Local Government* [2016] 1 WLR 2682. It is not for the decision-maker to demonstrate positively that he has complied with that duty: it is for the challenger to demonstrate that at the very least there is substantial doubt whether he has. Where the decision-maker refers to the statutory duty, the relevant parts of the *NPPF* and any relevant policies in the development plan there is an inference that he has complied with it, absent some positive indication to the contrary: *Mordue's case*, para 28. In examining the reasons given by a local planning authority for a decision, it is a reasonable inference that, in the absence of contrary evidence, they accepted the reasoning of an officer's report, at all events where they follow the officer's recommendation: *Rv Mendip District Council, Ex p Fabre* (2000) 80P&CR 500, 511 and *R (Zurich Assurance Ltd (trading as Threadneedle Property Investments)) v North Lincolnshire Council* [2012] EWHC3708 at [15]."

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

2.9 The judgement in respect of *R (Forge Field Society) v Sevenoaks District Council* [2014] EWHC 1895 (Admin) also makes this clear at paragraph 49 when it states that:

"This does not mean that an authority's assessment of likely harm to the setting of a listed building or to [the character or appearance of] a conservation area is other than a matter for its own planning judgement. It does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognise, as the Court of Appeal emphasised in *Barnwell*, that a finding of harm to the setting of a listed building or to [the character or appearance] of a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one. It is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. But an authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the statutory

presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.”

- 2.10 This key point is also made in paragraph 54 of *Forest of Dean DC v Secretary of State for Communities and Local Government* [2013] EWHC 4052 (Admin), which identifies that:

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

- 2.11 In other words, it is up to the decision maker (such as a local authority) to assess whether the proposal which is before them would result in ‘acceptable change’.
- 2.12 Section 72(1) of the *Planning (Listed Buildings and Conservation Areas) Act* of 1990 sets out the statutory duty for a decision-maker where a proposed development would have an impact on the character and appearance of a conservation area. This states that: *“...with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”*.
- 2.13 As far as Section 72(1) of the Act is concerned, it has previously been established by the Courts (*‘South Lakeland DC v Secretary of State for the Environment’*, [1992] 2 WLR 204) that proposed development, which does not detract from the character or appearance of a conservation area is deemed to be in accordance with the legislation. In other words, there is no statutory requirement to actively ‘enhance’.
- 2.14 However, it must be highlighted that Section 72(1) of the 1990 Act does not state that a decision-maker must preserve or enhance the character or appearance of a conservation area, and neither does it indicate that development that does not preserve or enhance a conservation area’s character or appearance is unacceptable and should be refused. The point is made in paragraph 54 of the judgement regarding *Forest of Dean DC v Secretary of State for Communities and Local Government* (2013) in particular.
- 2.15 Again, it is up to the decision maker (such as a local authority) to assess whether the proposal which is before them would result in ‘acceptable change’.

Archaeology

- 2.16 The Ancient Monuments and Archaeological Areas Act 1979 addresses the designation and management of scheduled monuments, providing for the maintenance of a schedule of monuments (and archaeological remains) which are protected.

- 2.17 The designation of archaeological and historic sites as 'scheduled monuments' applies only to those that are deemed to be of national importance and is generally adopted only if it represents the best means of protection.
- 2.18 The 1979 Act does not address the concept of 'setting' for scheduled monuments; just their physical remains. Therefore, for scheduled monuments, the protection of 'setting' is a matter of policy only.
- 2.19 In Wales, the written consent of the Welsh Minister is required for development that would impact upon a scheduled monument, and applications for Scheduled Monument Consent are submitted to Cadw, the Welsh Government's Historic Environment Service.

NATIONAL PLANNING POLICY

- 2.20 The Welsh Government published Future Wales: The National Plan 2040 on 24 February 2021 (WG 2021) and highlights in the foreword from the Minister for Housing and Local Government that it forms a 'framework for planning the change and development our country will need over the next two decades'.
- 2.21 In terms of the Welsh Government's objectives, Number 6 of 'Future Wales Outcomes' on Page 55 states that:

"Development plans will have a forward thinking, positive attitude towards enabling economic development, investment and innovation. Increased prosperity and productivity will be pursued across all parts of Wales, building on current activity and promoting a culture of innovation, social partnership, entrepreneurialism and skills-development in sustainable industries and sectors. The culture, heritage and environment of Wales will play a positive, modern role in the economy by attracting the interest and expenditure of tourists and providing a distinctive and trusted brand for Welsh businesses."
- 2.22 National planning guidance, concerning the treatment of the historic environment across Wales, is detailed in Section 6.1 of Chapter 6 Distinctive and Natural Places of PPW Edition 11, which was published on 24 February 2021 (PPW, 2021).
- 2.23 At Paragraph 6.1.2, it identifies the historic environment as comprising individual historic features, such as archaeological sites, historic buildings and historic parks, gardens, townscapes and landscapes, collectively known as 'historic assets'.
- 2.24 At Paragraph 6.1.6, the Welsh Government's objectives for the historic environment are outlined. Of these, the following are of relevance to the current assessment. These seek to 'conserve archaeological remains, both for their own sake and for their role in education, leisure and the economy' and 'safeguard the character of historic buildings and manage change so that their special architectural and historic interest is preserved'.
- 2.25 At Paragraph 6.1.7, it is stated that:

"It is important that the planning system looks to protect, conserve and enhance the significance of historic assets. This will include consideration of the setting of an historic

asset which might extend beyond its curtilage. Any change that impacts on an historic asset or its setting should be managed in a sensitive and sustainable way."

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

2.27 Regarding listed buildings, PPW states, at Paragraph 6.1.10, that:

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

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

2.29 Regarding conservation areas, it is stated at Paragraph 6.1.14 that: *"There should be a general presumption in favour of the preservation or enhancement of the character or appearance of conservation areas or their settings."*

2.30 Paragraphs 6.1.15 and 6.1.16 state that:

"There will be a strong presumption against the granting of planning permission for development, including advertisements, which damage the character and appearance of a conservation area or its setting to an unacceptable level. In exceptional cases the presumption may be overridden in favour of development deemed desirable on the grounds of some other public interest", and that: "Preservation or enhancement of a conservation area can be achieved by a development which either makes a positive contribution to an area's character or appearance, or leaves them unharmed."

2.31 It is apparent the PPW (2021) does not state that any damage to the character and appearance of a conservation area would result in the refusal of planning permission. It is only damage that is of an 'unacceptable level' which would result in a strong presumption against the granting of planning permission. The required judgement is concerned with what constitutes an 'unacceptable' level of harm, not whether there is any harm at all.

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

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

archaeological site shown to be of national importance).” At Paragraph 6.1.25 it states that: *“In cases involving less significant archaeological remains, planning authorities will need to weigh the relative importance of the archaeological remains and their settings against other factors, including the need for the proposed development.”*

2.32 Paragraph 6.1.26 recommends that:

“...Where archaeological remains are known to exist or there is a potential for them to survive, an application should be accompanied by sufficient information, through desk-based assessment and/or field evaluation, to allow a full understanding of the impact of the proposal on the significance of the remains. The needs of archaeology and development may be reconciled, and potential conflict very much reduced, through early discussion and assessment.”

2.33 In situations where planning approval would result in archaeological remains being lost or destroyed, at Paragraph 6.1.27, PPW (2021) states the following in respect of the Local Planning Authority’s (LPA) obligations:

“If the planning authority is minded to approve an application and where archaeological remains are affected by proposals that alter or destroy them, the planning authority must be satisfied that the developer has secured appropriate and satisfactory provision for their recording and investigation, followed by the analysis and publication of the results and the deposition of the resulting archive in an approved repository. On occasions, unforeseen archaeological remains may still be discovered during the course of a development. A written scheme of investigation should consider how to react to such circumstances or it can be covered through an appropriate condition for a watching brief. Where remains discovered are deemed to be of national importance, the Welsh Ministers have the power to schedule the site and in such circumstances scheduled monument consent must be required before works can continue.”

Technical Advice Note 24 (TAN 24)

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

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

2.36 It clarifies the policies and distinctions made in PPW (2018). A definition for a ‘historic asset’ is provided as follows:

“An identifiable component of the historic environment. It may consist or be a combination of an archaeological site, a historic building or area, historic park and garden or a parcel of historic landscape. Nationally important historic assets will normally be designated.”

2.37 Effects through changes within the setting of historic assets are set out in TAN 24 at Paragraphs 1.23 to 1.29. These paragraphs define the setting of an historic asset as comprising:

“...the surroundings in which it is understood, experienced, and appreciated embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. Setting is not a historic asset in its own right but has value derived from how different elements may contribute to the significance of a historic asset.”

2.38 TAN 24 also identifies factors to consider when assessing effects on the setting of historic assets.

2.39 Paragraph 1.26 states it is: *“...for the applicant to provide the local planning authority with sufficient information to allow the assessment of their proposals in respect of scheduled monuments, listed buildings, conservation areas, registered historic parks and gardens, World Heritage Sites, or other sites of national importance and their settings.”*

2.40 Paragraph 1.29 goes on to state that:

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

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

LOCAL PLANNING POLICY

2.42 The Carmarthenshire Local Development Plan (LDP) was adopted in December 2014 and provides the relevant local planning policy framework.

2.43 The following policies within the LDP document include elements which touch on the historic environment and are therefore potentially relevant to the proposed development within the site footprint.

2.44 Policy SP13 Protection and Enhancement of the Built and Historic Environment states that:

“Development proposals should preserve or enhance the built and historic environment of the County, its cultural, townscape and landscape assets (outlined below), and, where appropriate, their setting. Proposals relating to the following will be considered in accordance with national guidance and legislation.

a. Sites and features of recognised Historical and Cultural Importance;

b. Listed buildings and their setting;

- c. *Conservation Areas and their setting;*
- d. *Scheduled Ancient Monuments and other sites of recognised archaeological importance.*

Proposals will be expected to promote high quality design that reinforces local character and respects and enhances the local setting and the cultural and historic qualities of the plan area."

- 2.45 Policy EQ1 Protection of Buildings, Landscapes and Features of Historic Importance states the following:

"Proposals for development affecting landscapes, townscapes, buildings and sites or features of historic or archaeological interest which by virtue of their historic importance, character or significance within a group of features make an important contribution to the local character and the interests of the area will only be permitted where it preserves or enhances the built and historic environment."

- 2.46 These adopted planning policies, at the national and local levels, have each been taken into account in the preparation of this report.

Section 3 Methodology

ARCHAEOLOGICAL ASSESSMENT METHODOLOGY

- 3.1 This assessment report has been produced in accordance with the *Standard and Guidance for Historic Environment Desk-Based Assessment* issued by the Chartered Institute for Archaeologists (CIfA, 2020), with which EDP is a Registered Organisation. These guidelines provide a national standard for the completion of desk-based assessments.
- 3.2 The assessment principally involved consultation of readily available archaeological and historical information from documentary and cartographic sources. The major sources of information comprised the following:
- Data held by the Dyfed Archaeological Trust (DAT) Historic Environment Record (HER) on known archaeological sites, monuments and findspots within the vicinity of the application site;
 - Historic maps and other documents from the local archives and held online;
 - The Landscape Assessment and Decision Making Process (LANDMAP) dataset, which is available on the Natural Resources Wales (NRW)/Countryside Council Wales (CCW) website;
 - Aerial photographs and other relevant data that is held by the Central Register of Aerial Photography for Wales (CRAPW) in Cardiff;
 - The database for the Royal Commission on the Ancient and Historic Monuments of Wales National Monuments Record of Wales (NMRW);
 - Records held by the National Museum of Wales; and
 - The Historic Wales online portal.
- 3.3 The information gathered from these relevant national and local sources was checked and augmented by the completion of a site visit/walkover survey by an experienced surveyor in a period of fine and bright weather at the start of September 2022.
- 3.4 This report provides a synthesis of relevant historic environment information for the site and a study area which extends for up to a 1km radius, from the site boundary, and thereafter concludes with an assessment of its likely archaeological potential, made with regard to current best practice guidelines.
- 3.5 The report also considers the nature and significance of any effects arising within and beyond the boundary of the application site; i.e. in terms of the settings of designated heritage assets.

SETTING OF HERITAGE ASSETS

- 3.6 In addition to the potential for direct impacts on the fabric of an asset, when assessing the impact of proposals on designated historic assets, it is important to ascertain whether change within its 'setting' would lead to a loss of 'significance'.
- 3.7 This assessment of potential indirect effects is made according to Cadw's guidance entitled the *Setting of Historic Assets in Wales* (published on 31 May 2017) and consultation with the Archaeological Planning Officer at DAT.
- 3.8 In simple terms, the guidance states that setting “*includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape*” (Cadw, 2017).
- 3.9 It must be recognised from the outset that 'setting' is not a heritage asset and cannot itself be harmed. The guidance states that the importance of setting “*lies in what it contributes to the significance of a historic asset*”.
- 3.10 As such, when assessing the indirect impact of proposals on designated heritage assets, it is not a question of whether their setting would be affected, but rather a question of whether change within the asset's 'setting' would lead to a loss of 'significance'.
- 3.11 Set within this context, where the objective in this instance is to determine the potential for the proposed development to have an adverse effect on designated heritage assets beyond the boundary of the site, it is necessary to first define the significance of the asset in question - and the contribution made to that significance by its 'setting', in order to establish whether there would be a loss, and therefore harm.
- 3.12 The Cadw guidance identifies that change within a heritage asset's setting need not necessarily cause harm to that asset - it can be positive, negative or neutral.
- 3.13 Cadw's guidance (2017) sets out a four-stage approach to the identification and assessment of setting effects; i.e.:
- **Stage 1:** Identify the historic assets which might be affected;
 - **Stage 2:** Define and analyse the setting, to understand how it contributes to the asset's heritage significance;
 - **Stage 3:** Evaluate the potential impact of development; and
 - **Stage 4:** Consider options to mitigate or improve that potential impact.
- 3.14 Therefore, the key issue to be determined is whether, and to what extent, development within the site would affect the contribution that setting makes to the heritage significance of the asset under consideration, as per Stage 2 of the Cadw guidance.

Section 4

Existing Information

INTRODUCTION

- 4.1 The site does not contain any designated 'historic assets', such as scheduled monuments, listed buildings, conservation areas or registered historic parks and gardens. Furthermore, no part of the site is located within or adjacent to a registered historic landscape area.
- 4.2 Designated historic assets within a 1km radius of the site consist of two scheduled monuments. The location of each of these assets is shown on **Plan EDP 1**. In the interests of clarity, the Cadw listed building dataset does not contain any entries within the study area, and there are no conservation areas located within the study area.
- 4.3 There are no non-designated historic assets recorded on the DAT HER within the site, but a significant number are recorded in the site's wider surroundings. The positions of all DAT HER entries are identified on **Plan EDP 1**.

DESIGNATED HERITAGE ASSETS

- 4.4 There are no designated heritage assets within the boundary of the site, but the following paragraphs identify and describe (insofar as appropriate) the designated historic assets that lie within c.1km of the site area.

Scheduled Monuments

- 4.5 The two scheduled monuments within 1km of the site are Capel Dewi, Llwynhendy (**CM324**), the remains of a medieval chapel of ease, situated c.360m north-east of the site, and Genwen Engine House (**CM263**), an extant former engine house, located c.995m to the east north-east.
- 4.6 In view of the intervening distance, it is clear that neither would be directly impacted by the proposed development of the site through changes to its physical form and fabric. Further consideration of the potential for development of the site to impact the two assets indirectly through changes within their setting will be set out below in Paragraphs 4.40 to 4.45 which summarise the results of the site walkover.
- 4.7 During the pre-application consultation (PAC), Cadw were consulted and stated that no designated heritage assets within 3km of the site would have an impact on their setting due to intervening topography, buildings and vegetation blocking all views (See **Appendix EDP 2**)

NON-DESIGNATED HERITAGE ASSETS

Palaeolithic - Neolithic (c.500,000 BC – 2,500BC)

- 4.8 There are no Palaeolithic to Neolithic assets recorded on the relevant databases within the site, neither are there any identified within the 1km study area.
- 4.9 Given the absence of any evidence for activity from this period from within the site and its immediate environs, it is considered that there is a very low potential for the site to contain archaeological remains from the Palaeolithic, Mesolithic or Neolithic periods.

Bronze Age - Iron Age (2,500 BC - AD43)

- 4.10 There are no historic assets recorded on the relevant databases within the site, but two are known within 1km. These are both for the 'Graig' place name, which the HER indicates could be an indicator of a standing stone c.600m to the south-east (**11124**) of the site and 800m to the east (**11125**). In both cases, the HER entry goes on to state that the place name has been "*mistakenly taken to indicate the possible position of a standing stone.*" The HER entries add that both entries are in the vicinity of disused quarries depicted on early 19th century maps, from which the name probably derives.
- 4.11 Although there is evidence for the occupation and utilisation of the wider landscape of south-west Wales during this period, given the absence of reliable/verified evidence for activity from within the site and its immediate environs, it is considered that it has no more than a low potential to contain archaeological remains from either the Bronze Age period or the Iron Age period following it.

Romano-British (AD 43 - 410)

- 4.12 There are no Roman period heritage assets recorded on the relevant databases within the site; there are also no assets of this period identified within the surrounding study area.
- 4.13 Given the absence of evidence for activity from this period from within the site or its immediate environs, it is considered that there is no more than a low potential for the site to contain Romano-British archaeological remains.

Early Medieval (AD 410 -1066)

- 4.14 There are no early medieval heritage assets identified on the relevant databases within the site, nor within the wider study area.
- 4.15 Given the absence of evidence for activity from this period from within the site and its immediate environs, it is considered that there is a low potential for the site to contain early medieval archaeological features or remains.

Medieval (AD 1066 - 1485)

- 4.16 There are no identified heritage assets from the medieval period identified on the relevant databases within the site, and only one within the wider study area. This is for the Capel Dewi, a medieval chapel of ease to Llanelli parish and recorded as being ruinous in 1833.

Parts of the west and south walls of the nave survive, with the rest of the structure probably surviving under the road (**2072**). This asset is also a scheduled monument, **CM324**. It is situated c.360m north-east of the site.

- 4.17 Historic mapping from the early part of the 19th century indicates that the site lies well away from any centres of settlement, including the historic core of Llanelli. It seems highly likely that the site was agricultural fields during this time.
- 4.18 Given the paucity of evidence for significant activity from this period from within the site and its immediate environs, it is considered that there is a low potential for the site to contain significant medieval archaeological features or remains.

Post-Medieval- Modern (AD 1485 - present)

- 4.19 No post-medieval HER entries are located within the site, with the nearest within the wider study area comprising a cottage which is shown on the Tithe Map and recorded as being a restored dwelling (**21406**) c.115m to the east of the site.
- 4.20 There are a further 67 HER records from this period in the wider 1km study area. Of these, 25 are for extant domestic and religious buildings (**7276; 16205; 16206; 16207; 16208; 16210; 16724; 16725; 21401; 21403; 21404; 21405; 21406; 21428; 21430; 24288; 24289; 24290; 31653; 31663; 31665; 31668; 31677; 37417; 99494**) which predominantly represent the rural landscape prior to the 20th century expansion of Llanelli.
- 4.21 A survey of the 1st Edition Ordnance Survey Map identified a small single building (**125763**) and a review of the Second Edition identified 15 farmsteads (**115969; 115970; 115971; 116170; 116171; 116172; 116175; 116176; 116177; 116178; 21402; 21429; 21432; 31667; 31677**).
- 4.22 Fifteen of the other HER records relate to industrial sites, mainly associated with extractive industries of coal mining and quarrying (**4659; 4661; 8698; 8815; 31654**) and the associated infrastructure of spoil heaps and tramways (**21407; 24295; 27969; 30715; 30732; 31637; 31640; 31656; 31657; 31669**).
- 4.23 Six of the DAT HER records relate to transport infrastructure, such as trackways (**31655; 31660; 31661**) and milestones (**108133; 108139; 108315**). Of the other eight HER entries, nine are related to water management, such as sea defences (**31681; 31685**), flood banks (**31658; 31664; 31666; 31670**) and a drainage system (**31676**), reflecting the relatively low lying nature of the ground to the south of the site, and its former marshland character prior to reclamation and the course of the River Dafens post its course alteration to allow effective management of water within Llanelli docks (**31417**).
- 4.24 The remaining record from this period relates to a former school which has subsequently been converted into a library (**21474**).
- 4.25 The position of the site, beyond the edge of known historic farmhouse complexes and settlement cores, coupled with the character of the field boundaries surrounding it, suggests that it remained as undeveloped agricultural land throughout this period. Therefore, none of the HER records from the post medieval period listed above are

considered relevant to the site, and consequently will not be considered further within this assessment.

- 4.26 Therefore, the site is assessed as possessing a 'low' potential to contain archaeology from this period, other than 'low value' remains related to agriculture.

Previous Archaeological Investigations of Relevance

- 4.27 The DAT HER records eight previous pieces of intrusive archaeological fieldwork within 1km of the site, two of which lie within or overlap the site's boundary.
- 4.28 Within the site is a record noted as Land at Cefncaeau - Residential Development (**62770**). The Archaeological Appraisal was undertaken in 2007 by Cambria Archaeology for proposed residential development.
- 4.29 Overlapping the site boundary and covering the south, west and east of the study area is a further archaeological assessment relating to Llanelli and Loughour Wetlands (**31347**).
- 4.30 Away from the site but within the wider study area, a further four desk-based assessments are recorded (**62550; 32843; 48169**). The remaining records on the DAT HER refer to two watching briefs (**47626, 61988**) and an excavation (**96807**). In relation to these, they all represent small scale interventions, the results of which were largely negative or are considered too small scale to be of relevance to the site.
- 4.31 Indeed, taken as a whole, the archaeological 'fieldwork' completed at and around the site does not indicate or suggest it is of any greater than low or limited interest in terms of the potential to contain archaeological remains.

Early Maps

- 4.32 The earliest available historic map covering the site area is the Ordnance Survey surveyor's drawing of 1813 (not reproduced here, due to its small scale). This map shows the site as comprising enclosed farmland.
- 4.33 The 1839 Tithe Map for Llanelli (spelt 'Llanelly' by the Tithe Commissioners) shows the site as comprising six enclosed fields of agricultural farmland in a wider landscape of fields. No buildings or structures are depicted within the site (**Plan EDP 2**).
- 4.34 The Ordnance Survey maps dating from the late 19th and early 20th centuries show a very similar arrangement of land organisation and use, albeit with evidence for amalgamation of some of the fields and the removal of boundaries.
- 4.35 A footpath or unenclosed track is shown crossing the centre of the site, from south-west to north east, on the 1889 and 1948 editions of the Ordnance Survey maps (see **Plan EDP 2**), but there is no indication that either of the earthworks shown in the fields to the south-east crosses into the redline boundaries.
- 4.36 Analysis of the available historic maps has demonstrated that the site was in agricultural use throughout the 19th and 20th centuries, with its layout and internal boundaries largely unchanged throughout this period, apart from those noted above.

Aerial Photographs

- 4.37 A total of 48 vertical aerial photographs, covering the site and its immediate environs, were identified within the collection maintained by the Central Register of Aerial Photography for Wales (CRAPW) in Cardiff.
- 4.38 The available images span the period from March 1944 to October 1999 and largely corroborate the land use and development sequence shown on Ordnance Survey maps from the early 20th century. It should be noted that none of the aerial photographs consulted showed the linear embankments depicted on the Ordnance Survey maps to the south-east of the redline area.
- 4.39 The photographs demonstrate that, in the mid-1940s, the site layout remained unchanged from the late 19th century, but an image from August 1947 is of interest in the way that it identifies the construction of the housing estate to the north of the site. Aerial photographs taken in 1992 show the A484 being constructed.
- 4.40 No cropmark or earthwork features, indicating or suggesting the presence of any form of settlement activity, are visible within the site area or its immediate surroundings. Instead, the aerial photographs from CRAPW indicate a consistent programme of pastoral land use and management since the mid-20th century at least.

Site Walkover

- 4.41 The site was visited and walked by an experienced surveyor in fine, dry and bright weather, in early September 2022.
- 4.42 Photographs showing the form and appearance of the land at the site, as well as the form and character of the adjoining built environment, are included here as **Images EDP A3.1 to A3.8**. These should be reviewed in conjunction with the following paragraphs.
- 4.43 The survey identified no visible features of actual or known archaeological interest or likely archaeological potential, even though the rough pasture in the two fields would in theory be suitable for the identification of earthworks and soil marks.
- 4.44 The only earthwork is a slight break of slope curving from north-east to south-west towards the northern end of the eastern field parcel. It is not considered to be of any archaeological interest and may represent the remains of a former field boundary.
- 4.45 As described in Paragraph 1.8 (above), the field boundaries within and around the site are all very overgrown, but where it was possible to get views of the historic fabric, this showed they are not stone revetted and instead comprise a low earthen bank with trees and shrubs intermittently along their course.
- 4.46 Consideration was given to the potential for the residential development of the site to affect the settings of historic assets in its wider surroundings. In light of the intervening distances from the nearest scheduled monuments (no nearer than 330 metres) to the east and the north-east, the extent and nature of intervening residential development and the presence of substantial vegetation around the boundaries of the site, it is assessed that the proposed

development would have no impact on any of the designated historic assets within the site's wider surroundings.

Section 5

Assessment and Conclusions

- 5.1 This archaeological and heritage assessment concludes that the site does not contain any world heritage sites, scheduled monuments, registered historic parks and gardens or listed buildings and hence development of the site would not give rise to 'direct' impacts in that respect if the planning application is approved and implemented.
- 5.2 The historic and modern settings of each of the designated heritage assets within the study area have been assessed, and it is determined that the heritage significance of these assets would in no way be adversely affected by the form of development proposed within the site, either in terms of an effect on their physical form/fabric or through change to the contribution made by their setting.
- 5.3 There are no previously identified and recorded 'non-designated' archaeological features or remains within the site and so accordingly the proposals for residential development of the two fields of agricultural farmland forming the site would have no adverse impact on known archaeological remains.
- 5.4 Furthermore, based on the limited nature of the archaeological record in the wider study area, there is concluded to be no more than a '**low**' potential for previously unrecorded archaeological remains of significance to be present within the site, and with no reason to believe or expect that the site will contain archaeology of such significance that it might require preservation in situ.
- 5.5 The most likely archaeological features to be present within the site are medieval and later field boundaries and cultivation soils associated with its exploitation and management for agricultural production. These features, deposits and remains are assessed as being very unlikely to be of greater than 'low' interest or significance and there is deemed to be just a low potential for more significant archaeological deposits to be present within the site.
- 5.6 The proposed development is assessed as being unlikely to have a significant impact upon non-designated archaeological features, deposits or remains as: (a) there are no previously identified features or remains within the site; and (b) there is no more than a 'low' potential for hitherto unknown/unrecorded archaeological features or remains to be preserved within the site and adversely affected by construction groundworks.
- 5.7 In view of this low potential for the development to encounter significant archaeology during construction works, further investigation and recording is considered to be unwarranted and this desktop report should suffice to address and satisfy the planning process.
- 5.8 The site walkover and historic map evidence indicates that the field boundaries within the site may be of some antiquity because of the substantial banks. The Sketch Concept shows those around the edges of the site would be retained, but in contrast the central dividing hedgerow would be removed through the centre.
- 5.9 The loss of this central section of hedgerow is assessed as no more than a small impact and not one worthy of mitigation in view of the limited interest of this feature.

- 5.10 This assessment should provide sufficient information to positively determine a planning application when it is submitted. It is concluded that the proposed development accords with current legislation and the planning policies of PPW and the LDP.

Section 6

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Walker, E A 2011 A Research Framework for the Archaeology of Wales: Palaeolithic and Mesolithic

Welsh Government, 2017 Technical Advice Note 24: The Historic Environment

Welsh Government, 2021 Planning Policy Wales Edition Eleven

LIST OF CONSULTED MAPS

Ordnance Survey Surveyors Map, 1813

Llanelly Tithe Map, 1839

The First Edition Ordnance Survey Map, 1880

The Second Edition Ordnance Survey Map, 1891

The 1907 Edition Ordnance Survey Map

The 1916 Edition Ordnance Survey Map

The 1921 Edition Ordnance Survey Map

The 1907 Edition Ordnance Survey Map

The 1952 Edition Ordnance Survey Map

The 1965 Edition Ordnance Survey Map

The 1973 Edition Ordnance Survey Map

The 1992 Edition Ordnance Survey Map

Appendix EDP 1
Illustrative Masterplan
(Turley TATT3003 Rev A October 2022)



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- KEY**
- Application boundary 4.08ha
 - Ownership boundary
 - Primary Route
 - Shared Surface / Private Drive
 - Private Gardens
 - Illustrative Layout
1. Primary Access from A484
 2. Proposed open space, potential for natural play
 3. Illustrative Enhanced Landscape Bund
 4. Primary Route
 5. Shared Surface Street - loop
 6. Opportunity for walking loops into wider area
 7. Retained and enhanced water rhynes
 8. Opportunity for biodiversity enhancements
 9. Indicative Attenuation
 10. Retained Oak Tree
 11. Footpath link to existing Public Right of Way
 12. Existing Play Field and Park

CLIENT:
TATA Steel

PROJECT:
Land at Cefncaeau, Llanelli

DRAWING:
Illustrative Masterplan

PROJECT NUMBER:
TATT3002

DRAWING NUMBER: 3003 **CHECKED BY:** SM / WK

REVISION: A **STATUS:** FINAL

DATE: October 2022 **SCALE:** 1:2000 @ A3

emapsite

Turley

Appendix EDP 2 PAC with CADW

Emma Jupp

Subject: SCHEDULE 1C - ARTICLE 2D - CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION - TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURES) (WALES) ORDER 2012 - Pemberton, Llanelli

From: Denise.Harris@gov.wales <Denise.Harris@gov.wales>

Sent: 04 November 2022 08:31

To: Emily Bell <emily.bell@turley.co.uk>

Subject: FW: SCHEDULE 1C - ARTICLE 2D - CONSULTATION BEFORE APPLYING FOR PLANNING PERMISSION - TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURES) (WALES) ORDER 2012 - Pemberton, Llanelli

You don't often get email from denise.harris@gov.wales. [Learn why this is important](#)

I refer to the email below.

Scheduled Monuments

CM262 Glynea Colliery
CM263 Genwen Engine House
CM265 St David's Colliery
CM266 Penprys Pit Engine House
CM282 Pencoed Lead Works
CM324 Capel Dewi, Llwynhendy
CM387 Capel Isaf Cemetery

Registered Park and Gardens

PGW(Dy)14(CAM) Parc Howard

The above designated historic assets are located inside 3km of the proposed development, but intervening topography, buildings and vegetation block all views between them. Consequently, the proposed development will have no impact on the settings of these designated historic assets.

We therefore have no comments to make on the proposed development.

Regards



Denise Harris

Rheolwr Gwaith Achos/ Casework Manager

Diogelu a Pholisi, Cadw / Protection and Policy, Cadw

Amgylchedd Hanesyddol / Historic Environment

Llywodraeth Cymru / Welsh Government

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Cadw—er lles pawb.

For us all, to keep.

[Ymunwch â Cadw](#)
[Join Cadw](#)

Appendix EDP 3 Images



Image EDP A3.1: View of the eastern field within the site, looking north-west from the gap in the south-eastern boundary hedgerow.



Image EDP A3.2: View of the eastern field within the site, looking south-east from Erwlas and showing the nature of land use.



Image EDP A3.3: View looking south across the eastern field within the site from Erwlas and illustrating the form and character of the built environment south of the A484.



Image EDP A3.4: View of the western field within the site looking south from Erwlas and illustrating the form of land use.



Image EDP A3.5: Close-up of the hedgerow dividing the two fields within the site, here illustrating the form of its construction.



Image EDP A3.6: Close-up of the hedgerow enclosing the western end of the site, here viewed from beyond the boundary.



Image EDP A3.7: View from Erwlas looking north-west and showing the nature of the existing built environment adjacent to the northern boundary of the site.

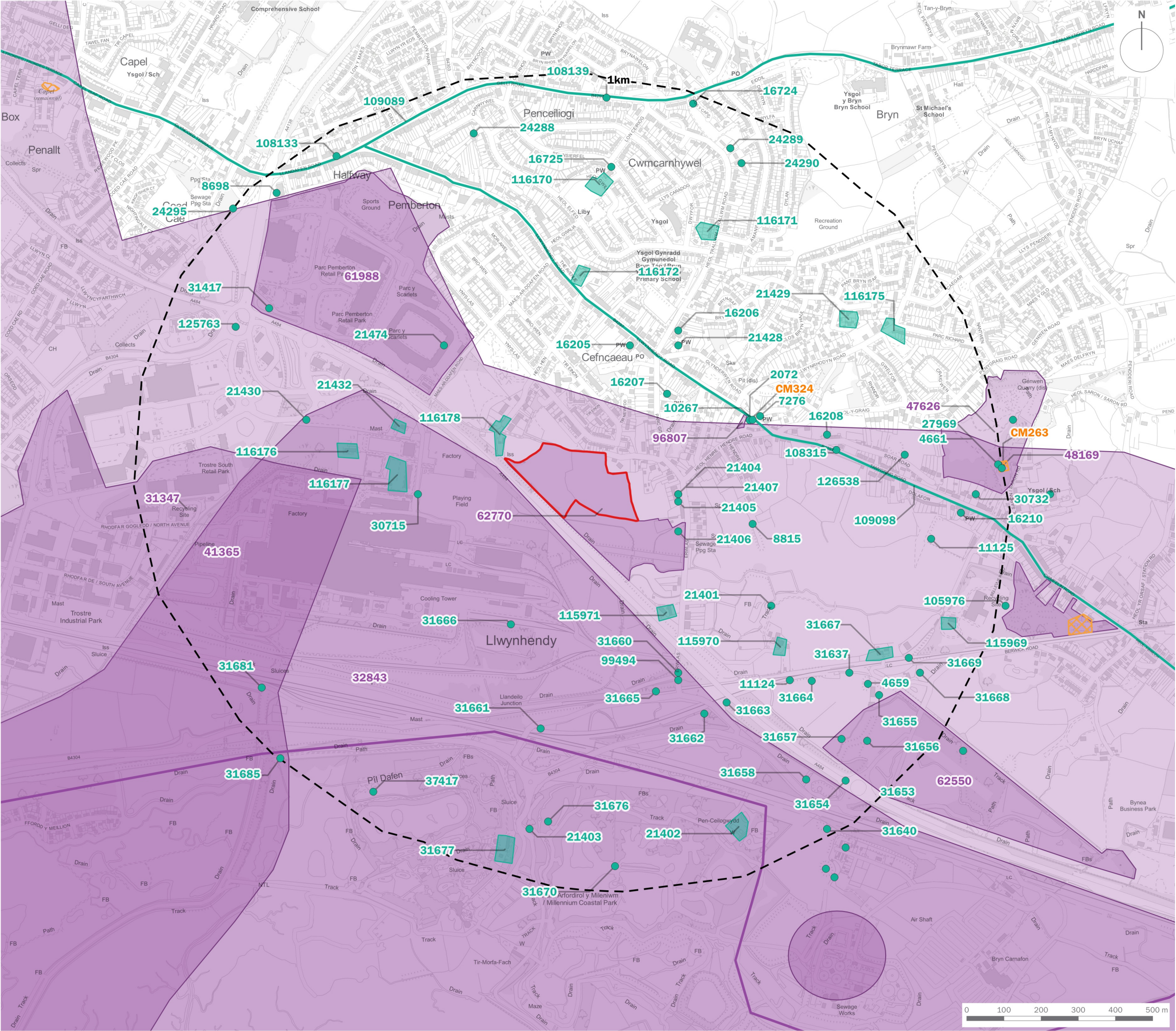


Image EDP A3.8: View south-west towards the site from the elevated ground of Llwynhendy Road immediately to the east of Capel Dewi, Llwynhendy Scheduled Monument (**CM324**), here showing the intervening distance and the extent of residential development.

Plans

Plan EDP 1: Overview of Known Heritage Assets
(edp7796_d001a 29 November 2022 EJu/ACr)

Plan EDP 2: Extracts of Historic Maps
(edp7796_d002a 29 November 2022 EJu/ACr)



Site Boundary

1km Study Area

Scheduled Monument

HER Monument

HER Event

client

TATA Steel

project title

Land at Cefncaeau, Llanelli

drawing title

Overview of Known Heritage Assets

date

29 NOVEMBER 2022

drawn by

EJu

drawing number

edp7796_d001a

checked

ACr

scale

1:10,000 @ A3

QA

GYo

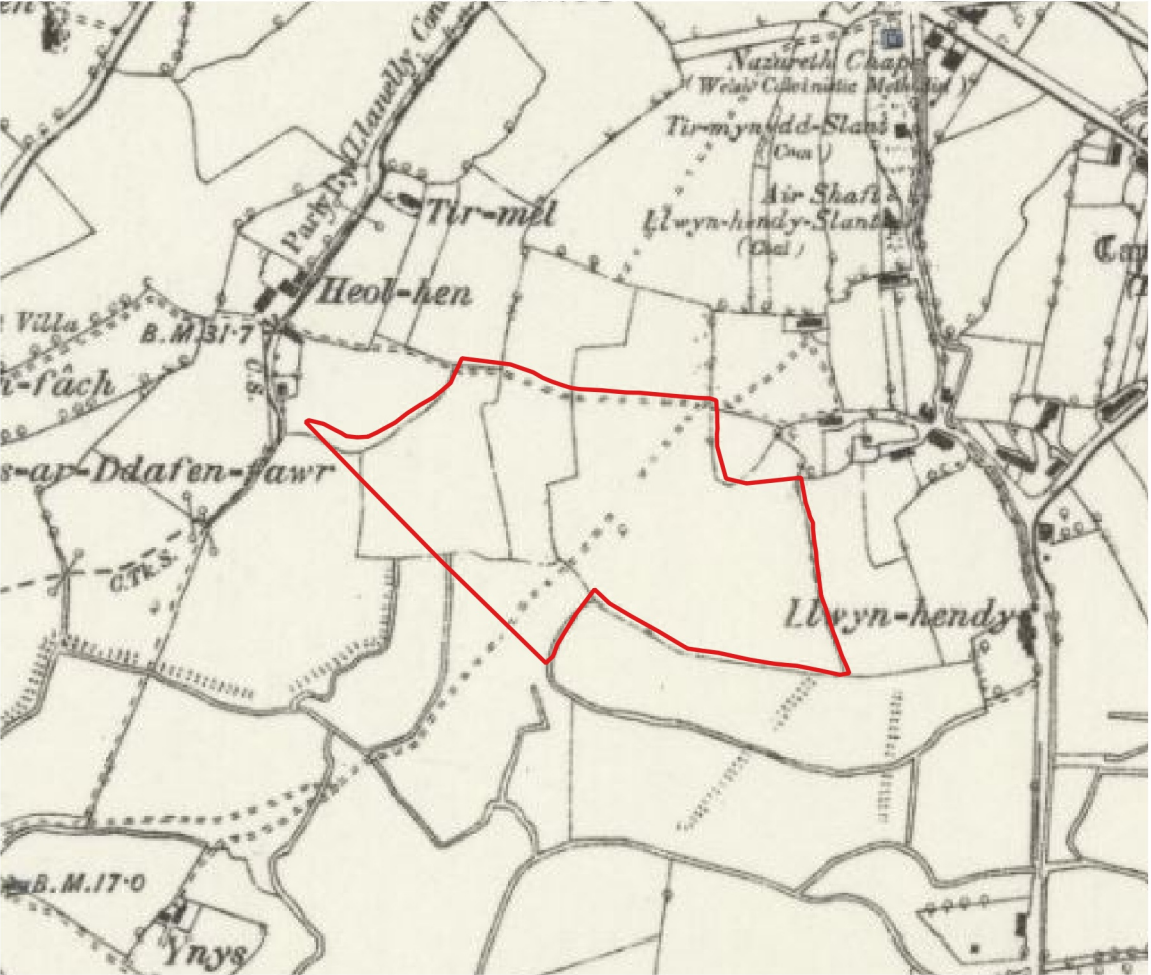
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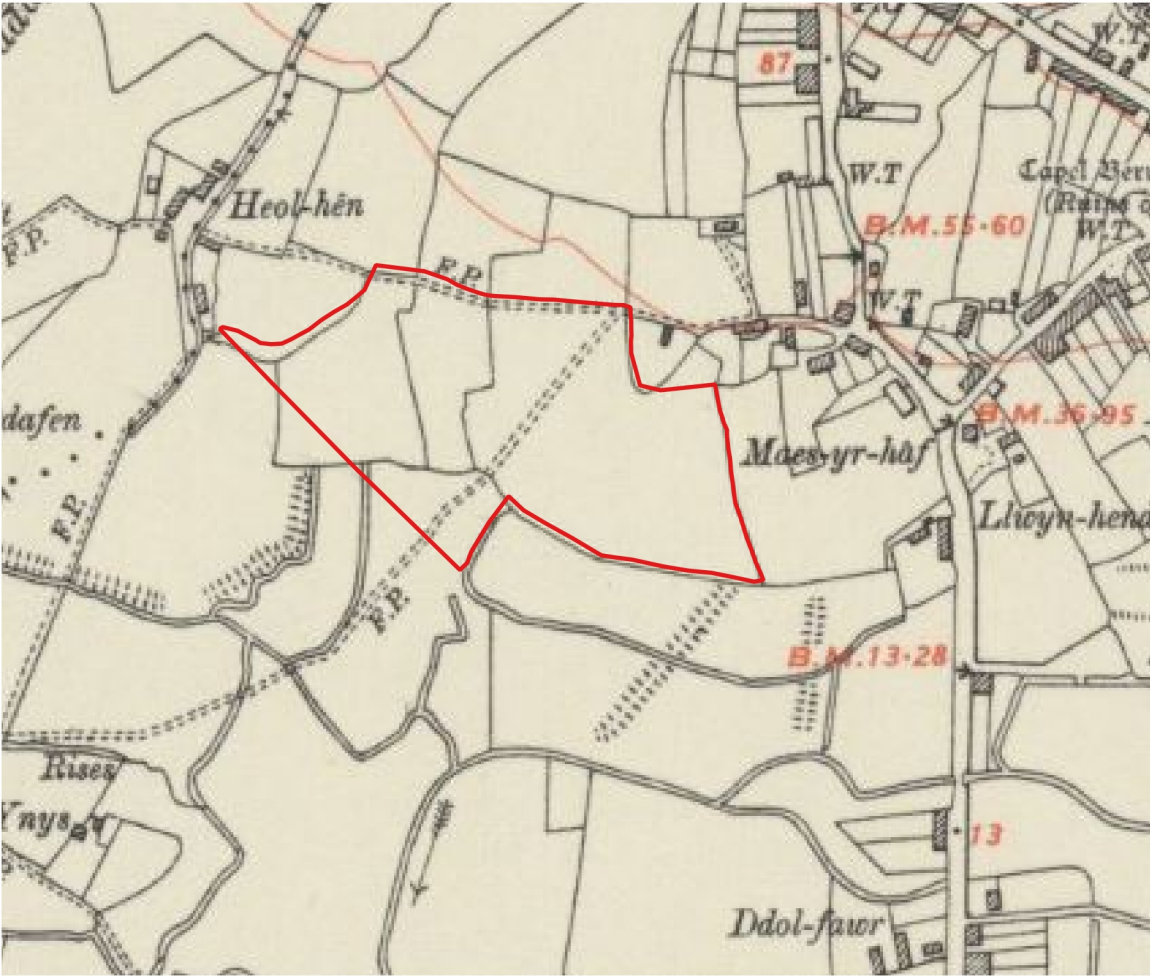
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1) Llanelli Tithe Map, 1839



2) Ordnance Survey Map, 1889



3) Ordnance Survey Map, 1948

 Approximate Site Boundary



client			
TATA Steel			
project title			
Land at Cefncaeau, Llanelli			
drawing title			
Extracts of Historic Maps			
date	29 NOVEMBER 2022	drawn by	EJu
drawing number	edp7796_d002a	checked	ACr
scale	1:5,000 @ A3	QA	GYo



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