



Patrick Green
Welsh Raised Bogs LIFE Project,
Natural Resources Wales,
Neuddlas
Tregaron
Ceredigion
SY26 6LG

12th October 2021

Dear Patrick,

Welsh Raised Bogs LIFE Project; Cors Fochno and South Sites

Thank you for sending through the two consultations for Cors Fochno and South Sites including Cors Caron, I'm responding to these consultations together as my concerns apply to both. I have consulted colleagues widely, including the other archaeological trusts and Cadw for their input into this response to ensure a consistency of approach. However I must apologise for the delay which is my fault entirely.

I appreciate the efforts which have gone into providing these assessments, but they both fall some way short of a desk-based assessment carried out to the standards set out by the Chartered Institute for Archaeologists¹ and the best practice guidance note which Cadw have also recently issued on peatland restoration². A desk-based assessment would normally include searches of all available data including; Historic Environment Record (HER)³, National Monuments Record⁴, National Library of Wales, aerial photographs (historic and contemporary), cartographic records, LiDAR, palaeoenvironmental analyses and any other projects or data which may be relevant to each specific location. A walkover survey is also an essential part of this assessment.

Both of the larger project areas; Cors Fochno and Cors Caron, benefit from a Cadw funded archaeological assessment carried out by Dyfed Archaeological Trust which aimed to identify and understand the archaeological potential of these wetlands⁵.

The assessment for works at Cors Fochno has used the data and information within the Wetland Margins Survey: Cors Fochno, however the assessment for the south sites has not referred to the Wetland Margins Survey: Cors Caron. Even so both of these Wetland Survey reports are now over 10 years old and whilst much of the information still stands, new sources of information should be assessed (I imagine better LiDAR data should be available for instance) and most importantly the impact of the proposed work should be reviewed against all the available data.

In addition the other South Sites (Esgyrn Bottom, Cernydd Carmel, Waun Ddu) have not been subject to a full desk-based archaeological assessment as described above.

YMDDIRIEDOLAETH
ARCHAEOLEGOL
DYFED CYF

The Corner House
6 Stryd Caerfyrddin
Llandeilo
Sir Gaerfyrddin
SA19 6AE

01558 823121

Ebost
info@dyfedarchaeology.org.uk
Gwefan
www.archaeologydyfed.org.uk

Cwmni cyfyngedig (1198990)
ynghyd ag elusen gofrestredig
(504616) yw'r Ymddiriedolaeth

DYFED
ARCHAEOLOGICAL
TRUST LTD

The Corner House
6 Carmarthen Street
Llandeilo
Carmarthenshire
SA19 6AE

01558 823121

Email
info@dyfedarchaeology.org.uk
Web
www.dyfedarchaeology.org.uk

The Trust is both a Limited
Company (1198990) and a
Registered Charity (504616)



Cadeirydd/Chair
Judith Wainwright MA MSc
FIC FRSA

Cyfarwyddwr/Director
Mr K Murphy BA MCIfA

¹ Cifa Regulations, Standards and Guidance <https://www.archaeologists.net/codes/cifa>.

² Cadw, Peatland Restoration and the Historic Environment – Guidance Note

³ The Historic Environment Record held by each regional Archaeological Trust

⁴ NMR held by the Royal Commission on Ancient and Historic Monuments of Wales

⁵ Wetland Margins Survey: Cors Caron by Phil Poucher, March 2010, PRN 96704, Report No 2009/56; Wetland Margins Survey: Cors Fochno by Phil Poucher, March 2009, PRN 94531, Report No 2008/114



In addition to these general points I would like to make some specific comments about each report;

WRB LIFE Historic Feature Assessment - South Sites

Cors Caron SAC

- The wetland survey highlights the potential for unexpected discoveries within the peat – a headless body was discovered by peat cutters in 1811 (PRN11497).
- The areas of work correspond to those identified in the Wetland Survey as areas 2, 3 and 4 which have been identified as having Medium archaeological potential for unrecorded archaeology, (Poucher 2010, p28, 29)⁶. This would strongly suggest the need for archaeological mitigation.

Esgyrn Bottom SSSI

- PRN122252 is incorrect, the mill record is PRN16944
- The statement that 'risk to historic features is thought to be very low' is not based on sufficient evidence, only when a full desk-based assessment and walkover survey is carried out can an assessment of risk be made.

Cernydd Carmel

- The statement that 'risk to historic features is thought to be very low' is not based on sufficient evidence, only when a full desk-based assessment and walkover survey is carried out can an assessment of risk be made.

Waun Ddu - Comments from Clwyd-Powys Archaeological Trust:

- the known historic assets are not at risk from the proposed works.
- We welcome the proposal to undertake some proactive management of historic features as suggested.
- The statement that 'risk to historic features is thought to be low' is not based on sufficient evidence, only when a full desk-based assessment and walkover survey is carried out can an assessment of risk be made.

WRB LIFE Cors Fochno

- Assessment using Archwilio HER of Wales – Archwilio is not appropriate for use in decision making or heritage management, the full Historic Environment Record must be consulted.
- Excavator drivers are not in a position to identify archaeological features whilst undertaking their work, if an area is deemed to be archaeologically sensitive then a suitably qualified individual must be present to observe the machining and be able to stop excavation to investigate/record any remains which are uncovered.
- Dyfed not Dyfi.
- Gelli or Western mini bog bunding sits within the High archaeological potential zone (Poucher 2009, p60) near to the medieval trackway. The assessment should consider the impact (direct or indirect) works might have - does the trackway lie outside the area which is bunded and therefore would it be subject to drying out? As mentioned above, this strongly suggests the need for archaeological mitigation in this area.

YMDDIRIEDOLAETH
ARCHAEOLEGOL
DYFED CYF

The Corner House
6 Stryd Caerfyrddin
Llandeilo
Sir Gaerfyrddin
SA19 6AE

01558 823121

Ebost
info@dyfedarchaeology.org.uk
Gwefan
www.archaeologydyfed.org.uk

Cwmni cyfyngedig (1198990)
ynghyd ag elusen gofrestredig
(504616) yw'r Ymddiriedolaeth

DYFED
ARCHAEOLOGICAL
TRUST LTD

The Corner House
6 Carmarthen Street
Llandeilo
Carmarthenshire
SA19 6AE

01558 823121

Email
info@dyfedarchaeology.org.uk
Web
www.dyfedarchaeology.org.uk

The Trust is both a Limited
Company (1198990) and a
Registered Charity (504616)



Cadeirydd/Chair
Judith Wainwright MA MSc
FIC FRSA

Cyfarwyddwr/Director
Mr K Murphy BA MCifA

⁶ It would have been useful to have the GIS tables showing the location of works to be carried out, however I have reviewed as best I can against the maps provided.



To summarise best practice would include a suitably qualified and competent expert⁷ carrying out a desk-based assessment, reviewing current evidence, and a walkover survey which then assessed the impact of the proposed works. This assessment should consider the impact of works (including indirect impacts to archaeological features which may be affected by changing ground conditions, and include all access tracks / working areas or site compounds) and offer recommendations for archaeological mitigation if deemed necessary.⁸

I appreciate that this response has been delayed and therefore if works are already underway I would strongly recommend that we have a discussion to ensure any appropriate archaeological mitigation is put in place and discuss the best way forward. Whilst this is not ideal, consultation in the early planning stages of the project should be carried out in order to safeguard the historic environment.

Under the terms of the MoU between NRW and the Welsh Archaeological Trust this advice is provided as one of the Cadw funded tasks, further advice or monitoring of archaeological work will need to be funded by NRW.

I am on leave until the 18th October but thereafter I'm available to discuss or clarify any concerns raised.

With best wishes

Alice Pyper
Heritage Management Project Manager
01558 825993
a.pyper@dyfedarchaeology.org.uk

YMDDIRIEDOLAETH
ARCHAEOLEGOL
DYFED CYF

The Corner House
6 Stryd Caerfyrddin
Llandeilo
Sir Gaerfyrddin
SA19 6AE

01558 823121

Ebost
info@dyfedarchaeology.org.uk
Gwefan
www.archaeolegdyfed.org.uk

Cwmni cyfyngedig (1198990)
ynghyd ag elusen gofrestredig
(504616) yw'r Ymddiriedolaeth

DYFED
ARCHAEOLOGICAL
TRUST LTD

The Corner House
6 Carmarthen Street
Llandeilo
Carmarthenshire
SA19 6AE

01558 823121

Email
info@dyfedarchaeology.org.uk
Web
www.dyfedarchaeology.org.uk

The Trust is both a Limited
Company (1198990) and a
Registered Charity (504616)



Cadeirydd/Chair
Judith Wainwright MA MSc
FIC FRSA

Cyfarwyddwr/Director
Mr K Murphy BA MCIFA

⁷ The work should be undertaken by the staff of a competent and professional archaeological body which shall be formally acknowledged by the regional archaeological curators; DAT-HM. The archaeological contractor will adhere to the Chartered Institute of Field Archaeologists' Standards and Guidance.

⁸ The scope of the work should be agreed in advance of the commencement of the work with DAT-HM, the regional archaeological curators.