

## **Mynydd Llanhilleth Wind Farm**

### **Heritage Briefing Note: Common Land**

### **edp6367\_r034e\_FINAL DRAFT**

#### **1. Introduction**

- 1.1 This Heritage Briefing Note has been prepared by The Environmental Dimension Partnership Ltd (EDP) on behalf of Pennant Walters (hereafter referred to as 'the Applicant') in relation to proposed wind farm development of land at Mynydd Llanhilleth, Blaenau Gwent (hereafter referred to as 'the Site').
- 1.2 This Briefing Note considered the effects of the Proposed Development on the historic environment with regard to an area of land proposed to compensate the loss of common land, hereafter referred to as 'Replacement Land'.

#### **2. Background and Scope**

##### **Site Context**

- 2.1 The Site is located at approximately Ordnance Survey National Grid Reference (NGR) SO 235 017 between Abersychan (within Torfaen County Borough Council (TCBC)) and Abertillery (within Blaenau Gwent County Borough Council (BGCBC)). It lies in the centre of a large, north-south trending ridge of high land between the Cwm Afon Valley (including Abersychan and Pontypool) to the east, and the Ebbw Fach Valley (Abertillery) to the west. This ridge comprises a series of plateaux typically between 400m and 550m above sea level and is characterised by much unenclosed land grazed by sheep, and to a lesser extent cattle and horses. Dry stone walls augmented with post and wire fencing demarcate the edge of the unenclosed area from the surrounding enclosed pastures.
- 2.2 A minor public highway, running north-east to south-west, from Abersychan to Llanhilleth, bisects the Site, with numerous unmetalled tracks otherwise crossing the area. A small stream/flush arises from a former quarry area to the north and flows southwards.
- 2.3 The Site partly overlaps with Mynydd Llanhilleth Common totalling circa 1,402 acres/567 hectares (ha), with an elevation between 489m in the north and 400m in the south, and with a minor col separating the two areas of higher ground within the Site: Byrgwm in the north and Mynydd Llanhilleth itself in the south.
- 2.4 There is much evidence of historic industrial activity on the slopes of the ridge, particularly in the Cwm Afon Valley.
- 2.5 The boundaries of the Site and the Replacement Land are illustrated on **Plan EDP 1**.



2.6 The Proposed Development comprises a wind farm consisting of up to seven wind turbines, each with a three-bladed rotor and maximum height to blade tip of 180m. The wind farm is expected to have an operational life of 30 years. The development proposals also require the construction of associated infrastructure, including:

- Access works - improvements to the existing access route together with the construction of new internal wind farm tracks and upgrading of existing tracks off the main internal access road;
- Turbine foundations including crane pads at each turbine location;
- Temporary construction compounds, laydown and storage areas; and
- Grid connection infrastructure, including the on-site substation, control building and underground cables linking the Site to the wider distribution network.

2.7 The development proposals are illustrated within the Site Layout Plan provided at **Appendix EDP 2**.

### **Scope of Assessment**

2.8 Turbine 3 and turbine 4, together with access tracks to these turbines as well as to turbines 1, 2 and 8 are sited within Mynydd Llanhilleth Common. As such, their construction and operation over the lifetime of the development will result in the loss of common land amounting to 7.1 acres. Such losses equate to 0.51% of the total area of Mynydd Llanhilleth Common.

2.9 To compensate for the loss of common land, hereafter referred to as the 'release land', an area totalling c.10 acres/4ha is proposed as 'Replacement Land', located to the immediate south of the former quarry area, to the west of turbine 8.

2.10 The extent of release land proposed for loss and location of replacement land is illustrated at **Appendix EDP 3**.

### **Consultation**

2.11 Pre-application consultation (PAC) was undertaken with CADW on the previous, now withdrawn, application. However, this response is still relevant to this application. A response dated 18 January 2023 stated a *"need for more detailed information on the archaeological sites located in the replacement land area, along with an assessment of the impact of the area being included in the common on them, to be provided before the submission of the application"*, with specific reference to the known archaeological features recorded by the HER in this area, including EA135, an area of quarrying identified by the Southeast Wales Ironworks Project as Blaen-cnwc Quarry and GGAT06416g, an air shaft of 18<sup>th</sup> or 19<sup>th</sup> century date.



- 2.12 The following Briefing Note assesses the archaeological potential of the Replacement Land, along with an assessment of impact to any identified features of archaeological interest, in line with the advice from CADW.

***Replacement Land: Location, Topography and Geology***

- 2.13 The Replacement Land is located within the south-east portion of the wider site, it is centred on NGR: 323183, 201074.
- 2.14 The Replacement Land comprises portions of two fields, divided by post and rail fencing. The largest field in the west part comprises rough ground on the steep, lower slopes of the Cwm Cnyw Valley. Spoil tips, indicative of a history of extractive industry (likely from past coal mining activities) are present here (discussed below) with occasional isolated trees. The smaller field to the east comprises acid grassland. Both areas are currently grazed by sheep.
- 2.15 The Replacement Land is bounded to the north by a former quarry, which was then used for forest plantation, which has recently been cleared. To the west, the land is bounded by the stream, Nant y Cnyw. To the east and south lie further areas of rough grazing and grass land.
- 2.16 Topographically, the Replacement Land slopes steeply towards the Nant y Cnyw, with a high point in the north-east (c.383m above Ordnance Datum (aOD)), and a low point in the south west (300m aOD).
- 2.17 In terms of geology, the majority of the Replacement Land is located on Grovesend Formation – Sandstone, a sedimentary bedrock formed between 309.5 and 308 million years ago during the Carboniferous period, however, at the western edge of the Replacement Land, closest to Nant y Cnyw, the geology is recorded as Hughes Member Formation, a mudstone, siltstone and sandstone sedimentary bedrock formed between 309.5 and 308 million years ago during the Carboniferous period ([www.gbs.com](http://www.gbs.com)).

### **3. Legislation**

***National Planning Policy***

- 3.1 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 Planning Policy Wales Edition Eleven, which was published on 24 February 2024 (PPW, 2024).
- 3.2 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’.
- 3.3 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”.*

3.4 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.”*

3.5 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”.*

3.6 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).”*

3.7 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.”*

3.8 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.”*



- 3.9 In situations where planning approval would result in archaeological remains being lost or destroyed, at Paragraph 6.1.27, PPW (2024) 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."*

#### **Local Planning Policy**

- 3.10 Relevant local planning policy is contained in the Blaenau Gwent County Borough Council Local Development Plan (LDP) (up to 2021) which was adopted by the Council in November 2012.
- 3.11 The LDP outlines policy SP11 concerned with the protection and enhancement of the historic environment:

#### *"P11 Protection and Enhancement of the Historic Environment*

*Blaenau Gwent's distinctive built environment will be protected, preserved and, where appropriate, enhanced. This will be achieved through:*

- a) Safeguarding nationally designated sites from inappropriate development and also protecting locally designated buildings of significant importance and conservation areas;*
- b) Enhancing sites of historic or archaeological value; and*
- c) The promotion of heritage tourism.*

- 3.12 These various planning policies, at the national and local level, will be considered within the completion of this Briefing Note.

## **4. Methodology**

- 4.1 This Archaeological Assessment has been researched and prepared in accordance with the Standard and Guidance for Historic Environment Desk-Based Assessment issued by the



Chartered Institute for Archaeologists (see ClfA, 2020), with which EDP is a Registered Organisation (RO).

4.2 In the first instance, 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:

- The Glamorgan-Gwent Archaeological Trust (GGAT) Historic Environment Record (HER), which holds information on known archaeological sites, monuments and finds, as well as previous investigations;
- Data which is held by The National Monuments Record of Wales (NMRW) online service Coflein;
- Historic maps held by online repositories;
- Recent and historic air photographs obtained from the Central Register of Aerial Photography for Wales (CRAPW) at Cardiff; and
- Environment Agency LiDAR datasets.

4.3 The information gathered from the repositories and sources identified above was checked and augmented during a site visit and walkover (completed in February 2023). This walkover considered the nature and significance of known and/or potential archaeological assets within the Replacement Land, identified any visible historic features and assessed possible factors that may affect the survival or condition of known or potential assets.

4.4 This report also provides a synthesis of relevant information for the site derived from an Archaeology and Heritage Baseline Assessment (AHA) produced by EDP (2024, Report reference edp6367\_r002), to allow for additional contextual information regarding the Replacement Land's archaeological interest or potential to be understood.

4.5 The assessment of significance of known/recorded archaeological remains within the Replacement Land makes reference (where relevant) to the four 'heritage values' identified by Cadw within its Conservation Principles document (Cadw, 2011). These are:

- The asset's evidential value, which is defined as those elements of the historic asset that can provide evidence about past human activity, including its physical remains or historic fabric;
- The asset's historical value, which is defined as those elements of an asset which might illustrate a particular aspect of past life or might be associated with a notable family, person, event or movement;



- The asset's aesthetic value, which is defined as deriving from the way in which people draw sensory and intellectual stimulation from the historic asset; and
- The asset's communal value, which is defined as deriving from the meanings that a historic asset has for the people who relate to it, or for whom it figures in their collective experience or memory.

## **5. Baseline Information**

- 5.1 The Replacement Land does not contain any designated assets such as Listed Buildings, Scheduled Monuments, Registered Parks and Gardens or Conservation Areas.
- 5.2 This assessment focuses entirely on the archaeological interest or potential of the Replacement Land and thus the potential for direct impacts upon the archaeological resource through changes to its preservation and/or condition, and does not consider the potential for indirect impacts upon historic assets as a result of changes to their settings.
- 5.3 As far as 'non-designated' archaeological assets are concerned, there are two monuments noted on the HER within the Replacement Land area. The NMRW also includes a single record located within the Replacement Land. These records are discussed in full below within the period specific sections.

### ***Prehistoric (BC 500,000–AD 43)***

- 5.4 No records of Prehistoric date are recorded within the Replacement Land by the HER or NMRW.
- 5.5 As detailed within the AHA for the wider Site (EDP, 2024), there is only minimal evidence of prehistoric activity in the local landscape, confined to evidence for four potential Bronze Age cairns, with the closest located c.1km north-west of the Replacement Land.
- 5.6 Considering the sparsity of records of this date and given that the Replacement Land was subject to industrial development (discussed fully below) there is only a very low potential for remains of this era to be present within the Replacement Land. No extant features of the prehistoric era were identified during the walkover survey.

### ***Roman (AD 43–AD 410)***

- 5.7 No records of Roman date are recorded within the Replacement Land by the HER or NMRW.
- 5.8 Only one Roman feature is recorded by the HER within the wider vicinity, discussed in full in the AHA. This comprises a possible Roman road which crosses the wider Site on an east-west alignment, roughly 2km north of the Replacement Land.





- 5.9 No extant features of the Roman era were identified during the walkover survey. Considering the sparsity of records of this date and given that the Replacement Land was subject to industrial development (discussed fully below) there is only a very low potential for remains of this era to be present within the Replacement Land.

#### ***Early Medieval – Medieval (AD 410–1485)***

- 5.10 No records of early medieval to medieval date are recorded within the Replacement Land by the HER or NMRW.
- 5.11 As detailed within the AHA, the HER and NMRW contain several records that are ascribed a medieval date within the local area. This includes a trackway located within the wider Site, approximately 250m south-east of the Replacement Land (535594/**GGAT07034g**). This record comprises a historic trackway set in deep cutting following the west edge of the common.
- 5.12 The remaining records are located a minimum of c.1.6km north of the Replacement Land closest and include the site of a former boundary cross (GGAT02092g), as well as a group of undated (but presumed potentially medieval) enclosures (GGAT08668g and GGAT08669g) and a platform (GGAT06904g) on Mynydd Llanhilleth which has been destroyed by mining.
- 5.13 It is likely that the Replacement Land during the medieval period was open or semi-wooded land that may have been used for common grazing. The enclosed fieldscapes presently within adjacent valleys most likely date from the post-medieval period when land became subject to private enclosure.
- 5.14 There are no known, extant medieval features within the Replacement Land and a very low potential for buried remains related to medieval agriculture, such as buried infilled ditches, pits or furrows which, if present, would have limited evidential value as historic assets of low or very low significance depending on their state of preservation.

#### ***Post-medieval and Modern (AD 1485–Present)***

- 5.15 The Replacement Land contains one record dating to the post-medieval to modern periods, as held by the HER. This record relates to a 19<sup>th</sup> century air shaft, recorded by the HER as 'intact' (**GGAT06416g**). No upstanding structural or earthwork remains related to this feature were noted during the site visit (discussed below), however, an open entrance to the below ground remains of the shaft was seen, covered by metal sheeting for safety. (**Image EDP A1.5**).
- 5.16 The HER also records the extent of Blaen-cnwc quarry (**EA135**), as identified by the Southeast Wales Industrial Ironworks Project, covering the majority of the western field which forms the Replacement Land. The quarry is described within the Southeast Wales Industrial Ironworks Project Year 4 (GGAT, 2008) as a “*small extractive area depicted on 1st edition OS maps consisting of a quarry, two old coal levels and a ventilation shaft*”. Evidence of earthworks relating to this industrial activity were noted during the site visit and are discussed in full below.





The industrial era remains within the Replacement Land possess a low degree of evidential and historical value and represent a historic asset of low significance.

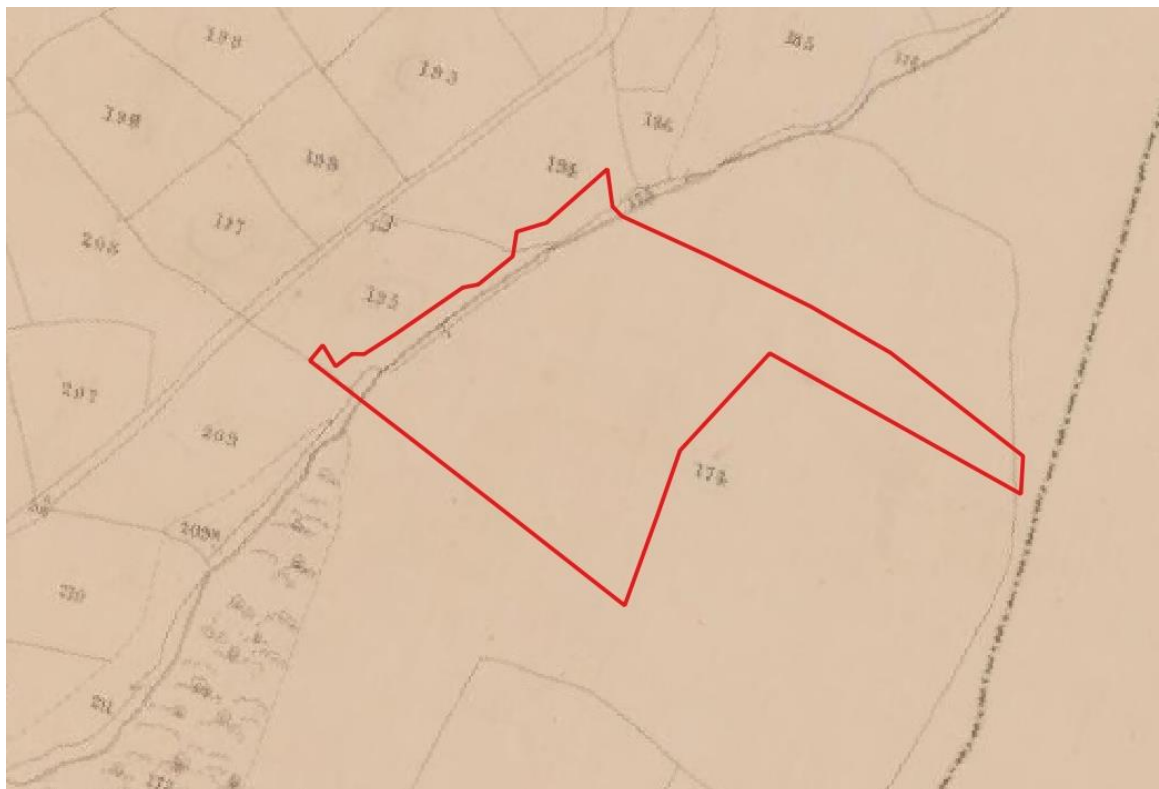
- 5.17 As detailed in full in the AHA, much of the wider Site was subject to opencast mining during the 20<sup>th</sup> century, with limited remains relating to industrial activity predating this, such as earthwork remains of spoil tips relating to Blaen-cyffin Quarry and Ty-Dafydd Quarry, located c.300m and 1km north of the Replacement Land respectively. To the south, c.500m from the Replacement Land, the HER records an airshaft **GGAT06414g** and mine GGAT06409g, related to the 'Farm Colliery' seen on the 1880 edition OS map, with Blaen-y-cwm Colliery also depicted on this map, c.500m south-east of the Replacement Land.
- 5.18 Evidence of post-medieval agriculture is also well known within the local landscape, described in full within the AHA; this includes records within the wider Site, including GGAT05408g Pen Tranch, a historic post-medieval farmhouse site derived from 19<sup>th</sup> century mapping, as well as GGAT06902g a ruinous probably post-medieval building within rectangular embanked enclosure at Pen Tranch, located c.1km and 1.5km from the Replacement Land respectively.
- 5.19 A large farm c.450m to the south-west of the Replacement Land is at Maes-y-cnyw, recorded by both the HER and NMRW as a large two-room plan farmhouse (GGAT02093g; NMRW: 422090). A further post-medieval well (**GGAT06415g**) and building (**GGAT06396g**) are also recorded c.50m and 100m west of the Replacement Land.
- 5.20 As detailed in the AHA, the key characteristics of the post-medieval agricultural landscape in the area are enclosed fields located at the upland margins or on the slopes of the stream valleys which run downwards from the plateau. The field systems are interspersed with a dispersed pattern of settlement comprising isolated small cottages and farmsteads as well as associated features such as wells, trackways or clearance cairns. The HER attests that most of the post-medieval assets identified above are now destroyed either through industrial activity or decline in farming in upland areas.
- 5.21 As discussed above, it is most likely that the Replacement Land was enclosed from open or semi-wooded land during the post-medieval period, to then be utilised for grazing on the upland margin prior to its industrial usage for coal mining and quarrying. Features exist within the Replacement Land that relate to 19<sup>th</sup> and 20<sup>th</sup> century agricultural and industrial activity. These features are discussed in further detail within the **Historic Mapping** and **Site Visit** sections of this Note.

### ***Previous Archaeological Investigations***

- 5.22 No archaeological investigations have been undertaken within the Replacement Land, nor are any recorded within the locality which would contribute to an understanding of the archaeological potential of the Replacement Land.

### **Historic Mapping**

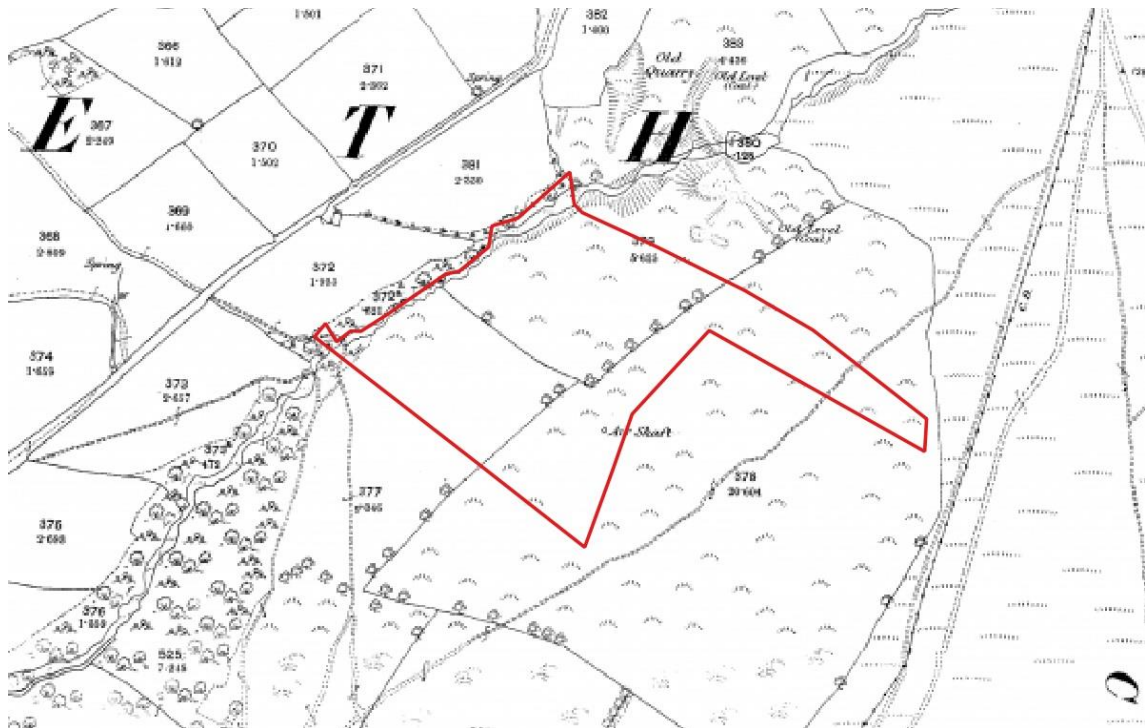
- 5.23 The earliest known depiction of the Replacement Land is the Tithe map of the Parish of Llanhilleth (1841) (**Figure EDP 1**). Aside from the stream bed and banks, this map shows the Replacement Land across a large irregular field which extends west and northwards. This field is recorded within the Tithe Apportionment as 'rough pasture'.



**Figure EDP 1:** Insert of 1841 Tithe Map of the Parish of Llanhilleth.

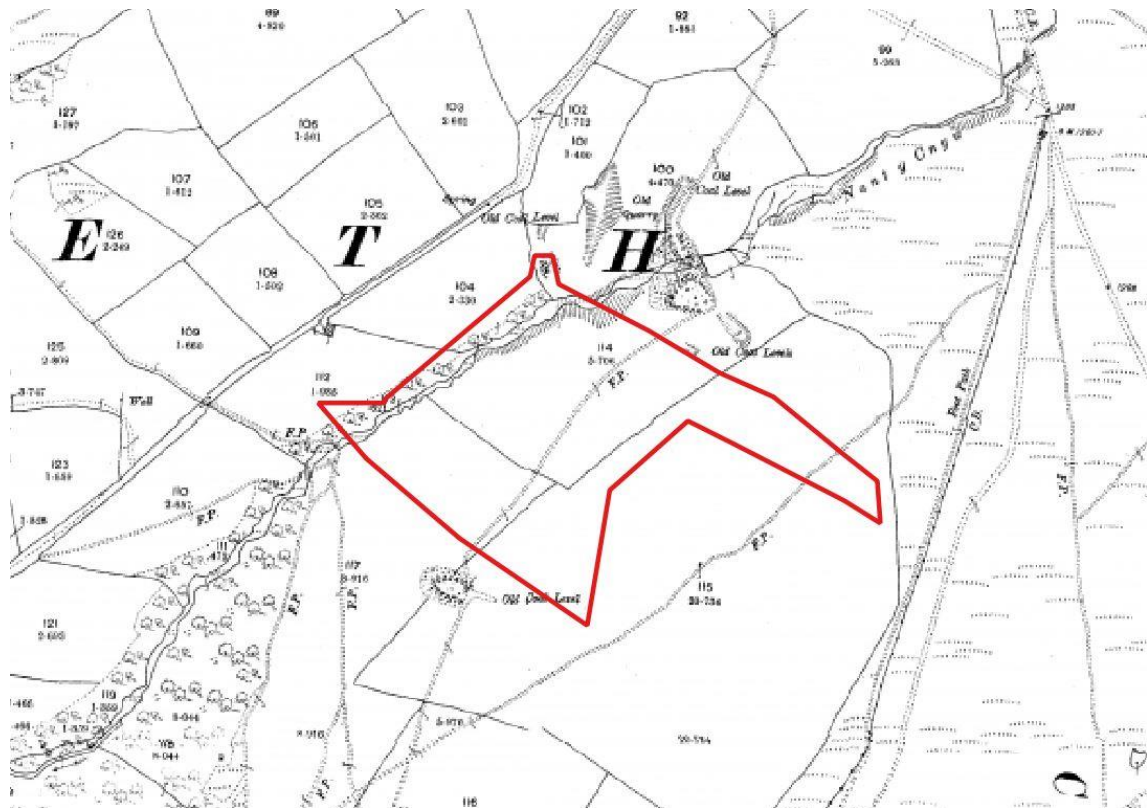
- 5.24 A detailed depiction of the Replacement Land is given on the OS map of 1880 (**Figure EDP 2**). The map shows the Replacement Land as mainly comprising three fields, with the eastern portion of the land forming part of a large, irregular field, and the western portion divided into a smaller square field and a portion of a larger 'L shaped' field. These field boundaries are not depicted on the tithe map, suggesting mid-late 19<sup>th</sup> century enclosure of the area. No evidence of these former field boundaries was seen during the site visit; however, these boundaries may exist as buried remains. Such remains would be of very low heritage value.
- 5.25 The map indicates that the northern and eastern fields comprised rough grassland, and the southern field a mixture of grassland, rough grassland and semi-wooded areas. An airshaft is noted within the western field, as indicated by the HER discussed above. No other features indicative of industrial activity are illustrated on this map, although a trackway is shown at the far east of the Replacement Land, running north-east to south-west, leading to Farm Colliery (disused) to the south. This trackway is still reflected in the route of the current Public Right of Way (PRoW) which crosses the eastern edge of the Replacement Land. No evidence of this

trackway was seen during the site visit. Immediately north of the boundary of the Replacement Land an old coal level and old quarry are recorded.



**Figure EDP 1:** Insert of 1880 edition Ordnance Survey Map.

- 5.26 It is noteworthy that the levels, quarry and colliery in the periphery of the Replacement Land are labelled as 'old' or 'disused'. This suggests they were probably used in the late 18<sup>th</sup> or early-mid 19<sup>th</sup> centuries when the mountain's coal reserves were initially exploited. By 1880 the more easily accessible reserves would have been mostly exhausted, and coal was being mined from larger collieries located further down in the valleys reaching deeper reserves with shafts. The airshaft within the Replacement Land probably relates to this later period as it is not shown as out of use on the 1880 map. The layout and formation of the Replacement Land are repeated on the 1885 edition OS map (not reproduced).
- 5.27 On the 1901 edition OS map (**Figure EDP 3**), the field boundaries at the Replacement Land are shown as the same as on the 1880 map, although the air shaft is no longer labelled, suggesting that it was no longer in use by this time. An 'old coal level' is recorded just beyond the southern boundary of the Replacement Land, which is not on the map of 1880. This suggests that the coal level was built sometime after 1880, but then was disused by 1901. As such, this level appears to have been short lived and in use for no more than a few decades at most. This short lifespan is further indicated by the small size of the associated spoil tips which are depicted emanating from it to the west.
- 5.28 A trackway is shown in 1901 heading north and south from the old coal level on the western side of the Replacement Land; no evidence of this track was visible during the site visit.

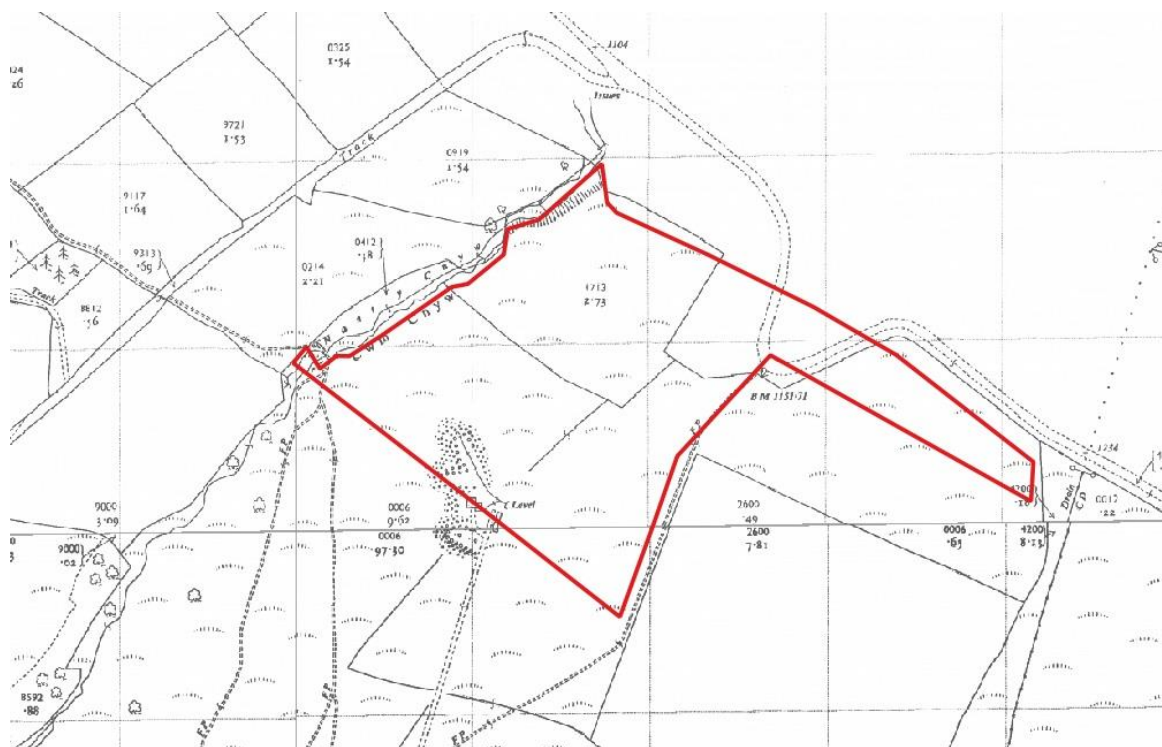


**Figure EDP 2:** Insert of 1901 edition Ordnance Survey Map.

- 5.29 No notable changes are shown on the 1921 edition OS map, although both the eastern and southern fields are shown to be rough grassland, with the northern field shown as grassland, with the remains of the old quarry immediately to the north. This land formation continues through to the mid-20<sup>th</sup> century.
- 5.30 The 1962 1:2:500 edition OS map (**Figure EDP 4**) shows a number of changes to the Replacement Land as a result of industrial activity. The map shows the land to the north-east of the Replacement Land as having been entirely consumed by activity related to the opencast mining which dominated the locality in the mid-20<sup>th</sup> century. The map shows a new 'Level' slightly to the north of the previous 'Old Coal Level', within the Replacement Land. The map shows spoil heaps in this location, associated with this new phase of mining, as well as illustrating short tram lines constructed leading from the Level to allow for spoil tipping. Three small associated buildings constructed to the east and west of the Level entrance. Earlier spoil tips, associated with the late 19<sup>th</sup> century Level are depicted immediately to the south, appearing to have been mostly subsumed by later tip material. This new 'Level' and its associated spoil heaps are also shown on the subsequent 1962 edition OS map (not reproduced).
- 5.31 This map also shows a number of changes to the northern extent of the Replacement Land, as a result of the open-cast mining which was undertaken in the area immediately north-east of the Replacement Land boundary. These changes comprise a realignment of the northern end of the central site boundary, to allow for construction of a road associated with the open-cast mining. A small part of the road itself is seen to extend into the Replacement Land, following a 'U-shape'



with a new boundary put in place to mark the edge of the mining works. The eastern footpath previously illustrated had also been redirected to move slightly west, in order to connect to this newly instated road.



**Figure EDP 3:** Insert of 1962 edition Ordnance Survey Map.

- 5.32 The 1977 edition OS map (not reproduced) shows the landscape after the opencast mine had been reinstated. On this map, the road adjacent to the Replacement Land had been realigned so that it ran in a straight course from north-west to south-east, rather than diverting south into the Replacement Land. The field boundary marking the extent of the open-cast mining and its road had also been removed, with the original north-south boundary orientation, as seen in the earlier 20<sup>th</sup> century maps, having been reinstated. The footpath which originally ran to the east was also reorientated to follow the line of this field boundary. This map shows that the open-cast mining to the north had ceased, and the land had been reinstated and forested. This forest is depicted on current mapping, however, the site visit established that this forested area to the north has recently been felled.
- 5.33 During the late 20<sup>th</sup> century, the field boundaries underwent alteration, with the central dividing boundaries removed entirely, and a new boundary created separating the land into western and eastern portions. The location and extent of the new Level, and its associated spoil tips, continues to be marked on current OS mapping; however, the Level is shown to have gone out of use by the 1999 edition OS map.



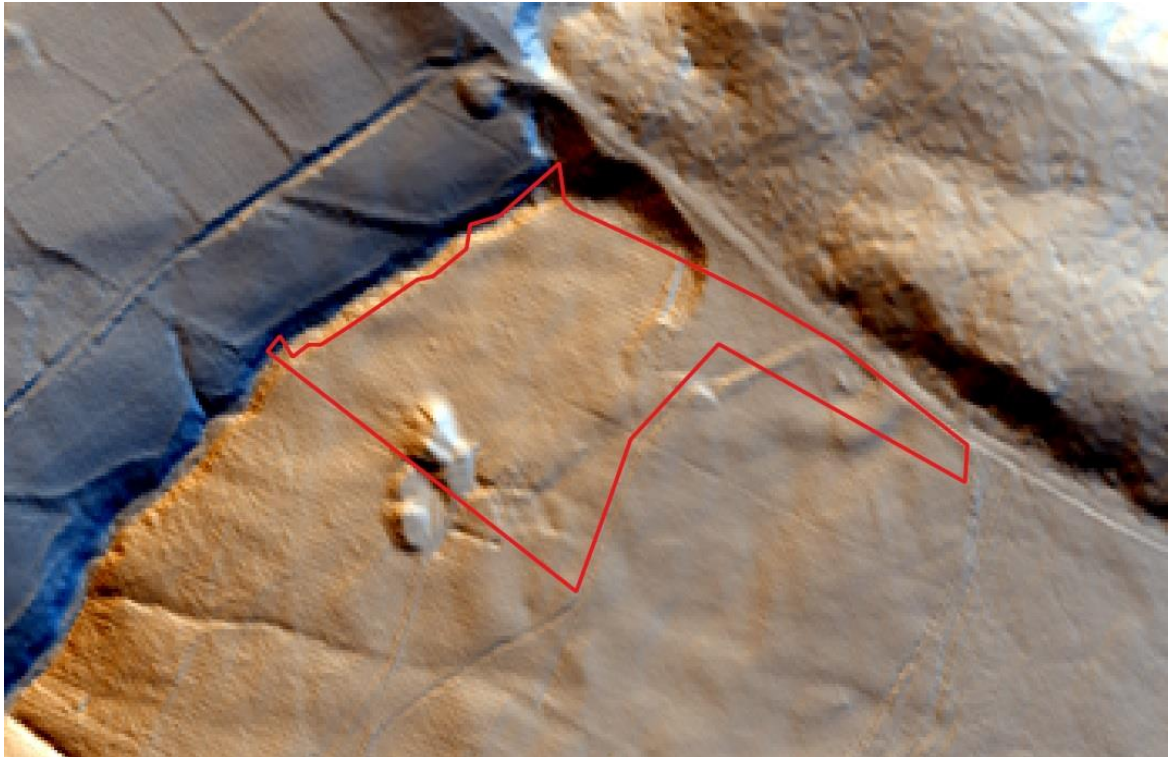
- 5.34 The historic maps provide a good record of the 19<sup>th</sup> and 20<sup>th</sup> century history of the Site illustrating its evolution from a marginal agricultural landscape of rough grazing, to an area utilised for coal mining and quarrying, before returning to rough, grazed land.

### ***Aerial Photographs***

- 5.35 Aerial photographs were consulted from the Welsh Government archive (CRAPW). Images were viewed dating from 1945 to 1991.
- 5.36 A single image dates from August 1945. The image shows the wider Site prior to opencast mining as it is shown on the OS maps of the early 20<sup>th</sup> century. The Replacement Land is shown as an area of rough grazing. No upstanding remains of the ventilation shaft recorded by the HER are visible, however, the 'old coal level' depicted on historic mapping immediately south of the Replacement Land, is visible as an area cleared of vegetation. There are a number of undulations adjacent to this to the east and north, extending into the Replacement Land, likely representing the remains of spoil heaps and extractive pits relating to the late 19<sup>th</sup> century mining of the area.
- 5.37 An aerial photograph of May 1963 shows the modern opencast mining underway across the wider Site, to the north of the Replacement Land. The Replacement Land is not shown to be mined, and appears as rough grassland, however, the area immediately to the north is widely mined.
- 5.38 Aerial photographs of April 1975 and April 1985 show the Replacement Land as rough grassland, although earthworks following the modern phase of industrial works relating to the new Level at the south of the Replacement Land are clearly distinguishable. These earthworks comprise large spoil heaps surrounding the Level. Although some earthworks and undulations are visible in this location in earlier photographs, relating to the 'old coal level', this photograph shows expansive spoil tipping, and is therefore considered the result of the mining within the Replacement Land during the later 20<sup>th</sup> century, with the tip subsuming the remains of any 19<sup>th</sup> century spoil tips. A steep rock face is also visible immediately north of the Replacement Land, adjacent to the quarry to the north, illustrating the opencast mining of the area immediately north of the Replacement Land during the later 20<sup>th</sup> century. This former mine to the north of the Replacement Land is shown to be functioning within the 1975 image, but disused with the ground reinstated and forested by 1985. The former route of the road which extended into the Replacement Land, associated with the open-cast mining to the north, is also visible in these images, although it has been removed by this time, with the road running simply east to west.
- 5.39 These features are illustrated again in an aerial photograph from August 1991, although this photo now shows the Replacement Land to be divided into a western portion of rough grazing, and eastern arable field.
- 5.40 No features of archaeological interest are identified by the aerial photographs, other than those earthworks which are reflective of the industrial activity during the late 19<sup>th</sup> and mid-late 20<sup>th</sup> centuries.

## ***LiDAR***

- 5.41 LiDAR data comprising a Digital Terrain Model (DTM) at 2m resolution was downloaded for the wider Site and its environs, including the Replacement Land, for analysis within the AHA. The data was processed using the RVT software with multi-hill shades considered the most useful visualisation (**Figure EDP 5**).



**Figure EDP 4:** Extracts of LiDAR data.

- 5.42 The LiDAR clearly shows the earthworks to the south of the Replacement Land at the location of the 'old coal level', shown in the 1901 edition OS map, and the new Level shown from 1962 onwards. These earthworks are interpreted as spoil heaps. Additional earthworks are visible extending roughly north-east from this location representing additional spoil heaps and pits.
- 5.43 The steeply sloping edge of the land immediately to the north, descending into the Replacement Land, is also clearly visible from the LiDAR imagery. This feature is likely related to the opencast mining which was undertaken during the later 20<sup>th</sup> century to the immediate north of the Replacement Land, or at least its reinstatement in the late 20<sup>th</sup> century.
- 5.44 A roughly linear earthwork is visible at the northern end of the Replacement Land, running north. This feature extends north towards the sloping edge and is interpreted as related to late 20<sup>th</sup> century open cast mining to the north of the Replacement Land; it appears to correlate either to the realigned field boundary which is depicted in the 1962 edition OS map, to allow for a new road, or associated with the mining ground works or reinstatement of the land once mining activity ceased.





- 5.45 Within the eastern field of the Replacement Land, a linear earthwork is visible running north-east to south-west. This earthwork appears to correlate to the edge of the road, and associated field boundary which were established during the mid to late 20<sup>th</sup> century in association with the open cast mining to the north of the Replacement Land. Immediately east of this, areas of undulating land are interpreted as spoil heaps, also likely to be the result of the later 20<sup>th</sup> century open cast mining within the Replacement Land.
- 5.46 The ventilation shaft recorded by the HER is visible as a slight depression, likely reflecting the entrance to the shaft.

#### **Site Visit**

- 5.47 A site visit was undertaken across the Replacement Land on 16 February 2023 to assess the current ground conditions and topography, as well as to confirm the continuing survival of any known archaeological remains and to identify any hitherto unknown remains. Identified remains are illustrated on **Plan EDP 1**.
- 5.48 Key observations from the visit were related to remains of the Blaen-cnwc Quarry, as well as later 20<sup>th</sup> century quarrying of the Replacement Land. As indicated by the HER, the Replacement Land forms the location of the former Blaen-cnwc Quarry, identified by the Southeast Wales Industrial Ironworks Project (GGAT, 2008). This area of industrial activity is first depicted on 1st edition OS maps showing a quarry, two old coal levels and a ventilation shaft. A late phase of mining undertaken in the mid to late 20<sup>th</sup> century is also depicted within historic mapping and clearly visible on aerial photographs from 1985, as discussed above.
- 5.49 The remains noted during the site visit comprised the following.

#### *Timber Remains adjacent to the 'Level'*

- 5.50 At the southern boundary of the Replacement Land, a small square structure comprising built remains was visible (**Image EDP A1.1**). These remains comprised a number of interlocked timber beams, embedded within the side of the spoil tip. The feature was in a poor state of preservation, having become largely overgrown, and much of the timber having broken or rotted away. However, given that the timber is preserved in any way suggests that this feature is likely related to the modern mining activity within the Replacement Land, rather than the 19<sup>th</sup> century coal level. The timber is located in the rough location of small buildings associated with the new Level, as seen in the 1962 edition OS map, however, no other structural remains were seen during the visit. Whilst the timber remains may be associated with former buildings, it is most likely that they simply represent a dump of material following the completion of the mining or potentially could be an element of material used to block the Level entrance.
- 5.51 Given this probable modern date, these timber remains are not considered to be of heritage significance.

#### *Spoil Tips adjacent to 'Level'*



- 5.52 Large spoil tips are visible at the southern boundary of the Replacement Land (**Image EDP A1.2**). These tips were seen to be expansive, spanning for some c.50m across the Replacement Land and of various heights, each with steeply inclining sides formed by spoil build up.
- 5.53 These earthworks are evident in the LiDAR imagery and aerial photographs from 1975 and 1985. Although earthworks are visible in photos prior to this date, which align with the mining activity associated with the 'Old Coal Level' depicted in the 1901 edition OS map, those seen are significantly larger and are considered to be the result of modern mining, associated with the new Level depicted on mapping from 1962 onwards.
- 5.54 These spoil tips are therefore predominantly modern, dating from 20<sup>th</sup> century quarrying, although it is likely that some earthworks relating to spoil tipping associated with the earlier coal level may also exist in this location, probably beneath or just to the south of the modern tips. As spoil tips these features have little or no evidential value but they do possess a limited degree of illustrative historic value, due to their large size and visibility in the landscape. In this way their presence illustrates the 19<sup>th</sup> and 20<sup>th</sup> century industrial history of this part of the landscape. Given their modern date, and very limited historic value, these earthworks are assessed as being of no greater than very low heritage significance.

#### *Extractive Pits East of Spoil Heaps*

- 5.55 To the east of the spoil heaps discussed above, a number of sub-circular and sub-oval depressions were noted (**Image EDP A1.3** and **A1.4**). These could represent extractive pits, but most likely are collapses in the ground associated with the adjacent mining to the west, known as 'crown holes'. These pits are likely associated with 19<sup>th</sup> century mining or 20<sup>th</sup> century within the Replacement Land but have little evidential value related to the history of mining in the area and are of no greater than very low heritage significance.

#### *Ventilation Shaft*

- 5.56 As recorded by the HER and illustrated on historic mapping, a mining ventilation shaft is located within the Replacement Land. The site visit established that no upstanding remains related to the shaft are extant. However, in this location, a small opening, temporarily covered by metal sheeting for safety, was noted (**Image EDP A1.5**). This opening is probably the shaft itself, which likely dates to the 19<sup>th</sup> century.
- 5.57 Given the poor preservation of this feature, with no upstanding remains, that is already well recorded on historic mapping, the ventilation shaft is assessed to be of very low heritage significance.

#### *Linear Earthworks (North)*

- 5.58 At the northern end of the Replacement Land, linear earthworks are visible, running northwards towards the steep edge which slopes downwards towards the Replacement Land. The



earthworks comprise several linear earthworks with the form of ditches and banks (**Image EDP A1.6**). Given their proximity to the edge of the open cast mining of the later 20<sup>th</sup> century these earthworks are most likely related this period of modern extraction to the north. These earthworks correspond to the realignment of the field boundary and construction of a road associated with the open-cast mining, as shown on the 1962 edition OS map. They are also located adjacent to the steep slope to the north, caused by the mining, or reinstatement of the ground following the closure of the mine.

- 5.59 These earthworks are therefore assessed as being associated with the open-cast mining to the north, either through ground extraction and reinstatement, or the associated road and field boundaries, and are of mid to late 20<sup>th</sup> century date. Therefore, these modern features do not hold any evidential or historic value and are not considered to be of heritage significance.

*Linear Earthworks (Eastern Field)*

- 5.60 With the eastern field of the Replacement Land, a linear earthwork was seen running largely north-east to south-west, as is visible on LiDAR imagery (**Image EDP A1.7**).
- 5.61 This feature comprises a linear bank and corresponded to the realignment of the field boundary and construction of a road associated with the open-cast mining, as shown on the 1962 edition OS map. This earthwork is therefore assessed as being associated with the open-cast mining to the north, reflecting the construction of a new road and associated field boundary marking the edge of the mining. As a feature associated with industrial activity of mid to late 20<sup>th</sup> century date, it does not hold any evidential or historic value and is not considered to be of heritage significance.

*Earthworks (Eastern Field)*

- 5.62 At the eastern edge of the Replacement Land, immediately east of the potential trackway discussed above, lie a number of undulating earthworks, as visible on LiDAR imagery (**Image EDP A1.8**). These earthworks are indicative of spoil heaps. Although the date of these earthworks cannot be definitely confirmed, their close proximity to the edge of the modern open cast mining activity to the north suggests they are most likely mid to late 20<sup>th</sup> century in date. They likely reflect spoil tips associated with extraction in the area of mining to the north, or with the reinstatement of this land following the closure of the mine. As modern spoil tips of small size these features do not hold any intrinsic evidential value and are not considered to be of any heritage value.



## **Summary**

5.63 A review of the desk-based information, in conjunction with a Site visit established that the Replacement Land contains remains relating to past industrial activity. This activity appears to relate to several phases which are summarised below:

- 1) Mid-late 19<sup>th</sup> century mining, as indicated by the ventilation shaft depicted on the 1880 edition OS map. The site visit established that buried remains of the shaft remain within the Replacement Land, although no upstanding structures associated with the shaft survive;
- 2) Late 19<sup>th</sup> century mining, as indicated by the 'Old Coal Level' depicted on the 1901 edition OS map. This level appears to have been short lived, having only been in use for a few decades at most. Remains of this phase of mining are evident through remains of spoil tips and pits, as shown on historic mapping and aerial photographs. However, the spoil tips associated with this activity appear to have been at least partially buried by tips related to later mining in an adjacent location; and
- 3) Mid-late 20<sup>th</sup> century mining, as indicated by the new 'Level' depicted on the 1962 edition OS map onwards, as well as the open cast mining located immediately north of the Replacement Land. This Level appears to have been opened adjacent to the previous level, and was in use during the late 20<sup>th</sup> century, before it is shown to be disused by 1990. Remains of this phase of mining are evident as large spoil tips adjacent to the location of the former Level, as shown on historic mapping and aerial photographs, and a timber structure which possibly blocks the entrance to the Level. Evidence of the opencast mining to the north during this period is also visible as earthworks at the north of the Replacement Land, which are likely associated with the construction of a road and associated boundary, marking the edge of the mining, as well as spoil tips reflecting extraction or reinstatement of the land.

5.64 This assessment also establishes that the Replacement Land contains a very low potential for buried remains of archaeological interest, other than potential features relating to 19<sup>th</sup> century field boundaries, which are likely heavily truncated by later industrial activity and would be of no greater than very low heritage value.

## **6. Impact Assessment**

- 6.1 The following section provides an assessment of potential effects on the Site's archaeology, such that might arise as a result of the proposed transition of this land to common land.
- 6.2 No intrusive ground works, clearance or levelling will be undertaken to allow for this transition of land use. As such, the primary effect of this proposed land use change on the archaeological resource within the Site is likely to result from the gradual erosion/truncation of features as a result of footfall, as public common land, and livestock grazing.



- 6.3 However, it is noted that the entirety of the Replacement Land was under pasture at the time of the Site visit, being grazed by sheep. As such, the present situation is likely to continue. The land, given the altitude and gradient is unlikely to accommodate anything other than sheep and as such, the present situation is likely to be unchanged. In this regard, grazing by sheep would not result in any demonstrable adverse erosive impact on the large robust features such as spoil tips and earthwork banks that characterise the Site's archaeology.
- 6.4 With regard to greater public footfall, it is noted that a PRoW already crosses the eastern field of the Replacement Land, the PRoW is shown to directly traverse the earthworks noted during the Site visit and interpreted as spoil heaps, likely resulting from modern opencast mining to the north. As such, allowing a greater degree of public access would not be especially different than the current situation. The change of land use would, however, potentially increase public footfall elsewhere within the Site, potentially resulting in increased erosion of the archaeological features.
- 6.5 However, considering that the Site is already grazed by livestock and, the archaeology comprises robust earthwork features and spoil tips that are of very limited heritage significance, this potential increase in footfall is unlikely to result in any damage to the assets in the Site.
- 6.6 The heritage assets identified within the Replacement Land are of no greater than very low heritage value and are not sensitive to low level physical impacts. As such, increased footfall and grazing as a result of the Proposed Development would not cause any harm to the historic environment.

## **7. Conclusion**

- 7.1 This Heritage Briefing Note concludes that the Replacement Land does not contain any world heritage sites, scheduled monuments, historic parks and gardens or listed buildings, where there would be a presumption in favour of their physical preservation in situ and against development.
- 7.2 The assessment has identified archaeological remains within the Site which relate to industrial coal mining of the 19<sup>th</sup> century and late 20<sup>th</sup> century. Remains associated with this activity include the remains of a ventilation shaft, pits, spoil tips, and earthworks relating to the construction of a road and associated field boundaries. None of the features are assessed as having more than very low heritage value, either on account of very limited evidential value or, for the large spoil tips, very low historical value, due to their illustration of the 20<sup>th</sup> century industrial landscape.
- 7.3 Given the very low heritage value of these assets, and their very robust nature as large earthwork features, they are not sensitive to low level physical impacts such as might be caused by increased footfall and grazing as a result of the Replacement Land becoming common. As such,



this change would not cause any adverse effect to historic assets which make up the historic environment.

- 7.4 The proposed change of land use is thus considered to accord to national and local planning policy as it relates to the historic environment.

## **8. References**

Blaenau Gwent County Borough Council 2012. *Local Development Plan up to 2021*

Chartered Institute for Archaeologists 2020. *Standard and Guidance for Historic Environment Desk-based Assessment (Reading)*

EDP 2024. *Mynydd Llanhilleth Wind Farm: Archaeology and Heritage Baseline Assessment*

GGAT 2008. *Southeast Wales Industrial Ironworks Landscapes; Year 4: Extraction Areas*

Welsh Government, 2021. *Planning Policy Wales Edition Eleven, Cardiff*



**Appendix EDP 1  
Images**



**Image EDP A1.1:** View north-west of timber remains at the southern boundary of the Replacement Land, likely representing a platform or dumped material relating to 20<sup>th</sup> century industrial activity, possibly blocking the entrance of a late 20<sup>th</sup> century mining level.





**Image EDP A1.2:** View north-east of extensive earthwork remains at the southern boundary of the Replacement Land, adjacent to the 'old coal level'. These were produced by 19<sup>th</sup> and 20<sup>th</sup> century coal mining.



**Image EDP A1.3:** View south of a sub-circular depression to the east of the 'old coal level', likely representing pits caused by the collapse of the mine workings.





**Image EDP A1.4:** View south of a sub-oval depression to the east of the 'old coal level', probably caused by the collapse of the mine workings.





**Image EDP A1.5:** View north of the ground opening at the centre of the Replacement Land likely representing the ventilation shaft recorded by the HER, associated with the 19<sup>th</sup> century industrial activity; no upstanding remains related to the shaft were recorded.





**Image EDP A1.6:** View north-west of the linear earthwork identified at the northern boundary of the Replacement Land, likely representing a boundary relating to the adjacent 20<sup>th</sup> century opencast mine.



**Image EDP A1.7:** View south-east of a linear earthwork identified within the eastern field of the Replacement Land, likely representing earthworks at the edge of the 20<sup>th</sup> century opencast mine.



**Image EDP A1.8:** View east of earthwork remains in the eastern field of the Replacement Land, likely representing earthworks at the edge of the 20<sup>th</sup> century opencast mine.

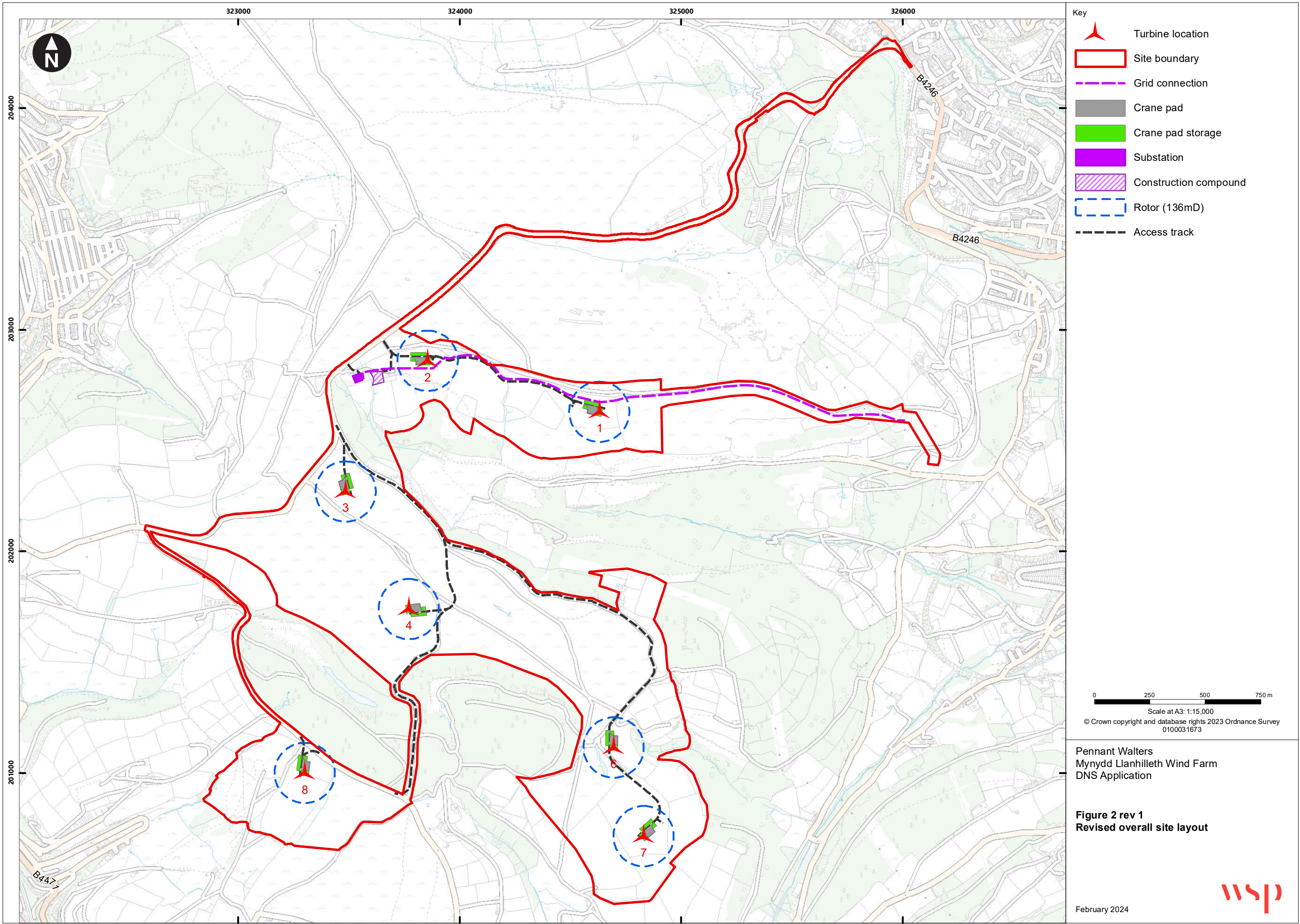




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**Appendix EDP 2**  
**Revised Overall Site Layout Plan**  
(Wood, 807095-WOOD-FG-OP-00017\_P02)





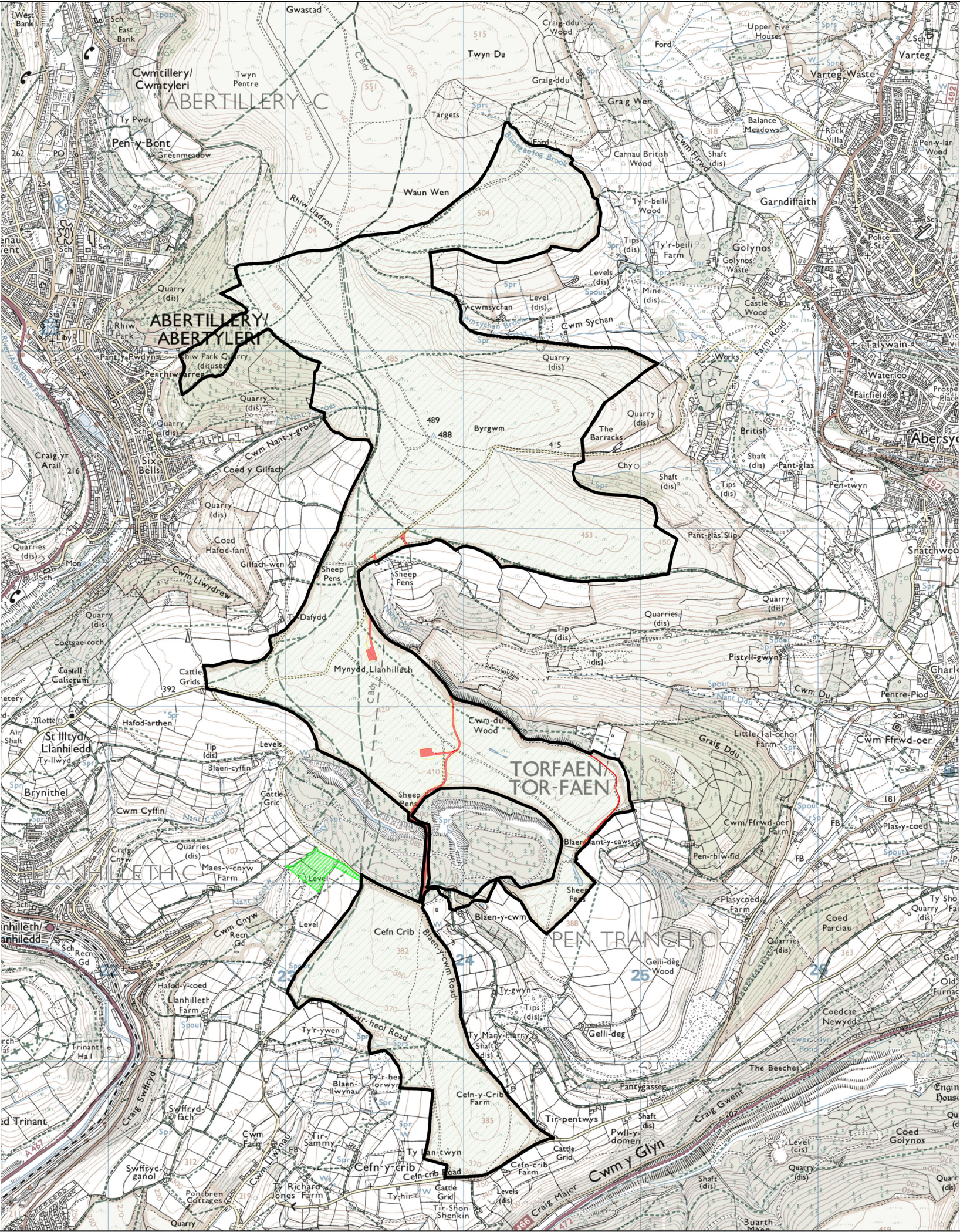




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**Appendix EDP 3**  
**Common Land Swap Plan**  
(Pennant Walters, MLWF SK19 Revision B, 08/11/22)






- NOTES**
1. Do not scale from this drawing.
  2. This drawing is copyright.
  3. For information only - Do not use for construction.


**COMMON LAND**  
(Area = 1402 acres)



**COMMON LAND TO BE DE-REGISTERED**  
(Area = 7.1 acres)



**REPLACEMENT COMMON LAND**  
(Area = 10 acres)



B	T5 removed	SE	11/07/24
A	Title and general update	SE	10/07/23
Rev	Description	App'd	Date

Status

Planning

Scheme

Mynydd Llanhilleth Wind Farm

Title

Common Land:  
Release and Replacement  
Land

**PENNANT  
WALTERS**

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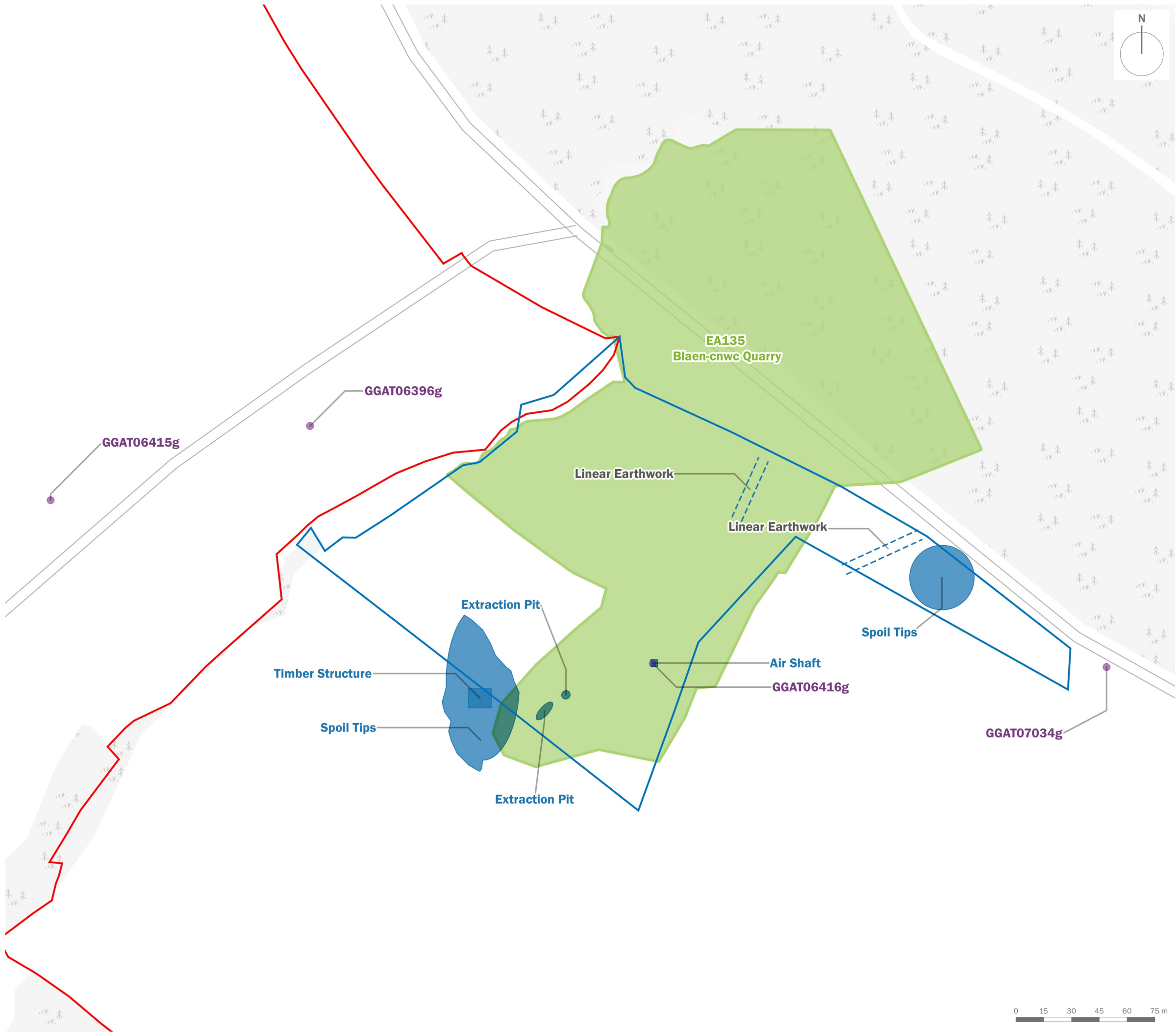
Made	SE	08/11/22	Ref	Dwg	Rev
Checked	ML	08/11/22	MLWF	SK19	B
Approved	SE	08/11/22	SK19		
Scale 1:25,000 at A3					



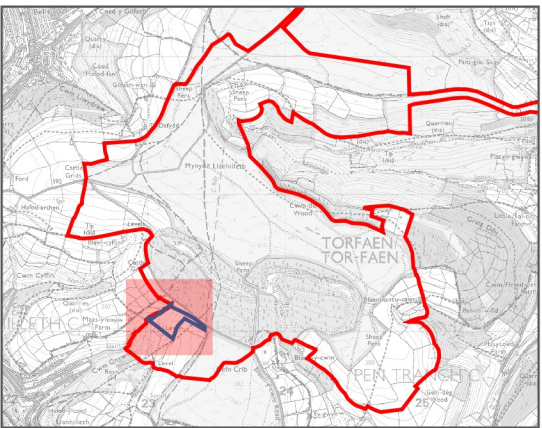


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**Plan EDP 1**  
**Archaeological Features Within Replacement Common Land**  
(edp6367\_d137b 08 August 2024 SWa/EBr)



- Site Boundary
- Replacement Common Land
- HER Monument
- Blaen-cnwc Quarry
- Archaeological Features on Site



client			
<b>Pennant Walters</b>			
project title			
<b>Mynydd Llanhilleth Wind Farm</b>			
drawing title			
<b>Archaeological Features Within Replacement Common Land</b>			
date	<b>08 AUGUST 2024</b>	drawn by	<b>SWa</b>
drawing number	<b>edp6367_d137b</b>	checked	<b>EBr</b>
scale	<b>1:2,000 @ A3</b>	QA	<b>Gyo</b>