



Carmarthenshire County Council
Planning Dept.
Civic Offices
Crescent Road
Llandeilo
SA19 6HW

17th September 2020

Dear Mr. Glenister

re: Planning application DNS/00427. Land east of the A48 and land SW of Tycroes, adjacent to Clawdd Ddu Solar Farm, Tycroes, Ammanford. NGRs SN57386 09389 SN59219 09551 & SN59904 09590

In our capacity as your archaeological advisors we have noted this application on the weekly planning list and checked its details against your planning portal. On behalf of your Authority we have also checked this application against the regional Historic Environment Record, a database that currently holds over 60,000 core records of archaeological and historic significance. The portion of these records relating to Carmarthenshire has been adopted by resolution of your Authority for the purposes of the Town and Country Planning (General Permitted Development) Order 1995.

The proposal is for a Development of National Significance – proposed solar park (DNS/3227364) including a cable route. The application is supported by a *Heritage and Setting Impact Assessment* prepared by Archaeology Wales (report no. 1854a, March 2020) We initially considered, in our response (08th September) to the planning inspectorate during the pre-application consultation, that a desk-based assessment was also required in order to assess potential direct impact of the development on archaeological deposits and visual impact on the setting of non-designated historic assets. However, following a closer look at the Archaeology Wales report, we are satisfied that the historic environment has been sufficiently addressed.

This report concludes that two of the three areas of the proposed development will potentially have an adverse visual impact on the setting of several designated historic assets including the scheduled monuments (GM386 and GM513) on Graig Fawr. **Further consultation with Cadw is required** over this issue.

Furthermore, the report considers that *the proposed development of the solar farms and associated structures will undoubtedly impact upon the evidential and historical value of the site itself, by removing archaeological potential*. It is suggested that this may be mitigated through implementing an appropriate level of archaeological recording, as occurred at the near-by Clawdd Du solar farm, where an archaeological condition was attached to consent. This comprised a geophysical survey before commencement of the development and an archaeological watching brief during the groundworks. We concur with these findings.

Accordingly, we recommend that an archaeological condition should be placed on planning consent, if forthcoming, in line with sections 6.1.23 and 6.1.27 of Planning Policy Wales (ed.10, 2018) and Sections 4.13 and 4.14 of TAN 24: The Historic Environment (2017). We recommend that it reads:

No development shall take place until a qualified and competent archaeologist has submitted a written scheme of investigation (WSI) for approval in writing by the local planning authority. This WSI will describe the different stages of the work and demonstrate that it has been fully resourced and given adequate time.

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J. Protheroe-Jones

Cyfarwyddwr/Director
K Murphy BA MCIFA



On behalf of the local planning authority, their archaeological advisors (DAT DM) will monitor all aspects of this work through to the final discharging of the condition. This work will not be deemed complete until all aspects of the WSI have been addressed and the final report submitted and approved.

Reason: to protect historic environment interests whilst enabling development

With this condition the developer will be required to produce a written scheme of investigation for submission to your Authority prior to the commencement of any development. As your archaeological advisors, we can assist in providing guidance to the applicant to produce this required document. However, in order for the applicant to be made fully aware of these archaeological requirements at this time, I have provided an outline below. They will include:

1. The presentation of a written scheme of investigation, prepared for the applicant by a qualified archaeological contractor. This document will need to be approved by your Authority before the development commences.
2. The Written Scheme will provide information on how the developer intends to mitigate against any adverse effects to the historic environment.
3. All aspects of the archaeological work should be carried out to the relevant Standard and Guidance of the Chartered Institute for Archaeologists (CIfA).
4. Where archaeological work is subsequently undertaken, an archive will be required as well as analysis and reporting the results of the work.
5. The Written Scheme should specify archaeological monitoring arrangements with the Dyfed Archaeological Trust-Development Management.
6. The applicant is strongly advised to consider contingency arrangements in the event of the unexpected discovery of significant archaeological material.

These recommendations are in line with Policies BE2 and BE3 of the Carmarthenshire Unitary Development Plan (adopted 2006).

We trust that you find this recommendation acceptable. However, if you wish to discuss this matter further please do not hesitate to contact us.

Yours sincerely

Mike Ings MCIfA
Archaeological Planning Manager
Dyfed Archaeological Trust

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