



**Crown Wharf, Port
Talbot Docks**

**Archaeological and
Heritage Assessment**

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**The Environmental Dimension
Partnership Ltd**

On behalf of:
Lanzatech UK Ltd

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Executive Summary

- S1 This Archaeological and Heritage Assessment has been prepared by The Environmental Dimension Partnership (EDP) for Lanzatech UK Ltd and in respect of the preparation, submission and positive determination of development proposals for a jet fuel plant with associated infrastructure.
- S2 It concludes that the implementation of the proposed development would have no direct impact on designated historic assets (such as listed buildings and scheduled monuments) because there are no designated historic assets located within the site and the site's boundary does not take in or include any part of such an asset.
- S3 It is similarly concluded that the approval and implementation of the proposed development would not result in a loss of significance from any one of the designated heritage assets located within the site's wider surroundings.
- S4 This conclusion is reached on the basis that, whilst as existing the site might form part of their wider setting, it is typically a small and peripheral aspect and where its relationship with the former industrial land which makes up the site is no more than limited. Equally, it is considered that the proposals themselves fit within a pattern of land use and industrial construction which is still typical of the area and so, hence, whilst there might be a change within the general surroundings of some of the designated assets distributed around the site's boundaries, this would not bear upon their significance and cause a loss of heritage significance and therefore 'harm'.
- S5 In terms of 'non-designated' historic assets, the assessment does not identify any indirect effects to the Registered Landscape of Special Historic Interest. Whilst negligible changes to its setting are anticipated in terms of the distant views of the site looking outwards, the views outwards are already defined by the existing industrial development at Port Talbot and so as a result it is assessed that these negligible changes would not result in a loss of significance from the Landscape of Special Historic Interest. No harm would result from the proposals' completion.
- S6 In addition, it is assessed that the implementation of the proposed scheme for the site would have no more than a 'minor adverse' impact on buried archaeological remains at the Construction Stage and no further impacts in this respect are anticipated as being likely to occur subsequently during the development's Operational Stage.
- S7 This assessment is made on the basis that there is generally no more than a 'low' potential for the proposed development to encounter and impact upon the conservation of significant archaeological sites, features and/or remains. Any horizons or deposits of earlier than post-medieval date, which might hence be of more than low significance, are expected to be deeply buried beneath deposits of modern made ground. Such deposits would therefore only potentially be encountered by the deepest elements of the proposed development, such as piles for the buildings' foundations. Any shallower horizons and deposits are very likely to derive from post-medieval and later activity at the site and be of no more than low or local significance, even though their conservation is more likely to be impacted by the implementation of the proposals.

- S8 Appropriate and proportionate mitigation for this limited impact on sub-surface archaeology would comprise the completion of a watching brief during the open cut excavation for construction, or a programme of archaeological trial trenching, to identify and record any archaeological features, deposits or remains of interest that would be either destroyed or damaged by the implementation of the works. This would be agreed in advance with the local authority's archaeological advisors at GGAT and then detailed in a Written Scheme of Investigation (or WSI) submitted to and approved by GGAT as a condition of planning permission being granted for the development.
- S9 No archaeological monitoring, observation or recording is proposed in respect of the piled foundations, or any very shallow workings to allow for surfacing of the temporary compound areas. In addition, no archaeological investigation is considered to be necessary or possible prior to the positive determination of the planning application because of the limited archaeological interest of the site and the extent of the Japanese Knotweed contamination making the completion of trial trench evaluation practically impossible.
- S10 If this proposed approach to archeological mitigation during construction is adopted and applied, there is no reason in terms of either archaeology or heritage impact why planning permission for this development should not be granted by the Local Authority, as the development which is proposed for the site would accord with the relevant planning policies for the conservation and management of the historic environment in Wales.

Section 1

Introduction

- 1.1 This report has been prepared by The Environmental Dimension Partnership Ltd (EDP) for Lanzatech UK Ltd and presents the results of an Archaeological and Heritage Assessment (AHA) of Crown Wharf, Port Talbot Docks (hereafter referred to as 'the site') in relation to development proposals for a new jet fuel plant.
- 1.2 The first aim of this report is to identify the nature and magnitude of any impacts arising from the implementation of the proposed development on known or potential archaeological sites, features, deposits and/or remains, in line with and to address Welsh Government planning guidance in Planning Policy Wales Edition 11 (PPW), Technical Advice Note 24 (TAN 24) and local planning policy.
- 1.3 In accordance with good practice and guidance, desktop sources have been augmented by the completion of a number of site visits and walkover surveys since instruction, with the most recent being undertaken in July 2023.
- 1.4 The second aim of this assessment is to identify the nature and magnitude of any impacts arising from the implementation of the proposed development on the significance of historic assets (whether designated or non-designated), either directly through changes to their physical form and fabric or indirectly through changes within their setting.

LOCATION AND BOUNDARIES

- 1.5 The site measures c.17.98 hectares (ha) in area and is located on the southern edge of the settlement of Port Talbot and western edge of the settlement of Taibach; it is bounded to the north by Port Talbot Docks and the main development of Port Talbot beyond this. In all other directions it is bounded by disused scrub land, as well as industrial buildings of the Tata Steelworks and associated industrial sites.
- 1.6 The site comprises six areas of land, as well as a proposed access road along the existing Phoenix Wharf Road. The main parcel, proposed for built development, hereafter referred to as the Production Development Zone (PDZ), is located immediately south of Port Talbot Docks, south-west of Hanson Cement and west of Davies Crane Hire. This parcel is largely covered by scrub and woodland, with occasional clearings and an area of hardstanding at its centre derived from the former factory buildings which stood on the site.
- 1.7 The western edge of this parcel, also comprising scrub and woodland, is proposed as a temporary compound, and set down area, hereafter referred to as a Temporary Construction Area (TCA).
- 1.8 Further to the west, and separated from the main parcel of Site by vegetation, is a small area of hardstanding, located immediately south of the unnamed port road. This area previously contained buildings which have since been demolished, although evidence of foundations was seen during the site visit. This parcel of land is also proposed as a TCA.

- 1.9 To the east of the main parcel is a large area of industrial buildings, currently utilised by Davies Crane Hire, as well as vacant industrial buildings, areas of hard standing, and areas of scrub. These buildings will be discussed further within Section 4 of this report. This parcel of land is also proposed as a TCA.
- 1.10 Further to the east, immediately east of the Docks and west of North Road, is a parcel of land comprising scrubland, areas of hardstanding, and a former access road running parallel to the dock. This land is proposed as TCA within the proposals for development at the site.
- 1.11 The final parcel of Site is a small area located immediately to the north of the main parcel, across the unnamed port road within the Port Talbot Docks; this area is proposed as a Marine Unloading/Loading Facility.. It currently comprises the disused remains of several jetties.
- 1.12 The site is centred on National Grid Reference (NGR) 276434, 188637; its location and layout are shown on **Plans EDP 1 to EDP 3**.

GEOLOGY AND TOPOGRAPHY

- 1.13 The British Geological Survey (BGS) records the underlying bedrock geology at the site as South Wales Middle Coal Measures Formation, comprising a mix of mudstone, siltstone and sandstone. This sedimentary bedrock was formed approximately 310 to 318 million years ago in the Carboniferous Period. This geology indicates that the local environment was previously dominated by swamps, estuaries and deltas.
- 1.14 A superficial deposit of Tidal Flat Deposits, comprising clay, silt and sand formed up to two million years ago in the Quaternary Period, is also recorded across the majority of the main and eastern parcels within the site. The western edge of the main parcel and the western parcel of the site contain superficial deposits of Blown Sand, a sedimentary superficial deposit formed between 2.588 million years ago and the present during the Quaternary period.
- 1.15 Topographically, the site is largely flat, however there is a very gradual slope downwards to the northern edge and the Docks, as well as to the west. The highest point is located at c.11m above Ordnance Datum (aOD) and the lowest point is located at c.8m aOD.

PROPOSED DEVELOPMENT

- 1.16 The planning application seeks full planning permission for the erection of an Ethanol to Jet Fuel production facility, with associated development. This development will include the demolition of existing structures and erection of a Sustainable Aviation Fuel (SAF) production facility, including enclosed ground flare, storage tanks, installation of pipework and electrical, processing and utility equipment, administration, warehouse and laboratory buildings, new access, car parking and transport infrastructure including a truck loading area and associated works, hard and soft landscaping, areas for temporary construction laydown, and associated development.

Section 2 Legislation and Planning Guidance

- 2.1 This section sets out existing legislation and planning policy, governing the conservation and management of the historic environment, of relevance to this application.

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 and conservation areas through the planning process in Wales.

- 2.4 Section 66(1) of the 1990 Act concerns listed buildings and states that:

“...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 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 a proposed development that does not preserve them is unacceptable and should therefore be refused.

- 2.7 This point is made very clearly in Paragraph 54 of the judgement regarding *Forest of Dean DC v Secretary of State for Communities and Local Government (2013)*, 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.”

- 2.8 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’.

Archaeology

- 2.9 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.
- 2.10 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.
- 2.11 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.
- 2.12 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

- 2.13 The Welsh Government (WG) published Future Wales: The National Plan 2040 on 24 February 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’.
- 2.14 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.”*
- 2.15 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 2021 (PPW, 2021).
- 2.16 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’.

2.17 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’.

2.18 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.”

2.19 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”*.

2.20 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.”

2.21 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”*.

2.22 Regarding historic parks and gardens, PPW states, at Paragraph 6.1.18, that:

“Planning authorities should value, protect, conserve and enhance the special interest of parks and gardens and their settings included on the register of historic parks and gardens in Wales. The register should be taken into account in planning authority decision making.”

2.23 It goes on to say at Paragraph 6.1.19 that *“The effect of a proposed development on a registered park or garden, or its setting, is a material consideration in the determination of planning applications.”*

2.24 Regarding historic landscapes, PPW states, at Paragraph 6.1.20, that:

“Planning authorities should protect those assets included on the register of historic landscapes in Wales” and then adds that “The register should be taken into account in decision making when considering the implications of developments which meet the criteria for Environmental Impact Assessment or, if on call in, in the opinion of the Welsh Ministers, the development is of a sufficient scale to have more than a local impact on the historic landscape. An assessment of development on a historic landscape may be required if it is proposed within a registered historic landscape or its setting and there is potential for conflict with development plan policy.”

2.25 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).”

2.26 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.*”

2.27 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.”

2.28 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)

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

2.30 TAN 24 sets out that it provides ‘guidance on how the planning system considers the historic environment during development plan preparation and decision making on planning applications’.

- 2.31 It clarifies the policies and distinctions made in PPW (2018). A definition for a 'historic asset' is given as:

"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."

- 2.32 Effects through changes within the setting of a designated historic asset are covered 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."

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

- 2.34 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."*

- 2.35 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."

- 2.36 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

Neath Port Talbot County Borough Council Local Development Plan (LDP) 2011-2026

- 2.37 Relevant local planning policy is contained in the Local Development Plan (LDP), which was adopted by the Council in January 2016.

- 2.38 Section 5.5 of the LDP outlines policies concerned with the treatment of the Historic and Cultural Environment.

2.39 This section contains the following policies relevant to this assessment:

Strategic Policy SP21 Built Environment and Historic Heritage

“The built environment and historic heritage will, where appropriate, be conserved and enhanced through the following measures:

1. *Encouraging high quality design standards in all development proposals;*
2. *Protecting arterial gateways from intrusive and inappropriate development;*
3. *Safeguarding features of historic and cultural importance; and*
4. *The identification of the following designated sites to enable their protection and where appropriate enhancement:*
 - (a) *Landscapes of Historic Interest;*
 - (b) *Historic Parks and Gardens;*
 - (c) *Conservation Areas;*
 - (d) *Scheduled Ancient Monuments; and*
 - (e) *Listed Buildings and their curtilage.”*

Policy BE 1 Design

“All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places.

Proposals will only be permitted where all of the following criteria, where relevant, are satisfied:

1. *It complements and enhances the character and appearance of the site, building or area in terms of siting, appearance, scale, height, massing and elevation treatment;*
2. *It respects the context of the site and its place within the local landscape, including its impact on the important arterial gateways into the County Borough, its effects on townscape and the local historic and cultural heritage and it takes account of the site topography and prominent skylines or ridges;*
3. *It utilises materials appropriate to its surroundings and incorporates hard and soft landscaping and screening where appropriate;*
4. *It would not have a significant adverse impact on highway safety, the amenity of occupiers of adjacent land or the community;*

5. *Important local features (including buildings, amenity areas, green spaces and green infrastructure, biodiversity and ecological connectivity) are retained and enhanced as far as possible;*
6. *It achieves and creates attractive, safe places and public spaces, taking account of 'Secured by Design' principles (including where appropriate natural surveillance, visibility, well lit environments and areas of public movement);*
7. *It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community;*
8. *It uses resources, including land and energy, as efficiently as possible through:*
 - (a) *Making the best and most efficient use of the land available through being of appropriate density taking into account the character and appearance of the area, normally a minimum of 35 dwellings per hectare in the Coastal Corridor Strategy Area or a minimum of 30 dwellings per hectare in the Valleys Strategy Area;*
 - (b) *The layout and form of the development does not preclude the reasonable use of other adjacent land;*
 - (c) *Developing brownfield land in preference to greenfield land where possible; and*
 - (d) *Minimising building exposure while maximising solar gain.*
9. *Its drainage systems are designed to limit surface water run-of and flood risk and prevent pollution; and*
10. *The layout and design of the development achieves inclusive design by ensuring barrier free environments, allowing access by all and making full provision for people with disabilities."*

Policy BE 2 Buildings of Local Importance

"Development proposals that would affect buildings that are of local historic, architectural or cultural importance will only be permitted where:

1. *They conserve and where appropriate enhance the building and its setting; or*
2. *It is demonstrated that the development could not reasonably be accommodated without affecting or replacing the building and the reasons for the development outweigh the heritage importance of the site."*

Policy BE 3 The Canal Network

1. *“In order to protect and conserve the canal network, the following lengths of canal will be safeguarded:*
 - (a) *The Swansea Canal at Trebanos from the County Borough boundary to the southern edge of the playing fields;*
 - (b) *The Swansea Canal from Pontardawe Town Centre to Godre’r Graig;*
 - (c) *The Tennant Canal; and*
 - (d) *The Neath Canal from Briton Ferry to Ysgwrfa Bridge, Aberpergwm.*

Proposals which would prejudice the conservation, restoration and operation of these safeguarded lengths of canal will be resisted. Proposals will need to demonstrate that they would not adversely affect the setting of the canals or prevent or discourage the use of the canals for recreation and water supply;

2. *Developments affecting locations where lengths of canal have been drained, infilled, culverted, obstructed or cut off from the remainder of the network, but where there is the possibility of future reinstatement, will be expected to take into account the historic line of the canal and to avoid the introduction of buildings or structures that would prevent reinstatement.”*

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

Section 3

Methodology

ARCHAEOLOGICAL ASSESSMENT METHODOLOGY

- 3.1 This AHA has been researched and drafted 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).
- 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:
- 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;
 - The National Monuments Record of Wales (NMRW) online service Coflein;
 - Historic maps held by online sources;
 - Recent and historic air photographs obtained from the Central Register of Aerial Photography for Wales (CRAPW) at Cardiff;
 - Environment Agency LiDAR datasets; and
 - The Historic Wales online portal.
- 3.3 These sources of baseline information were checked and augmented through a series of site visits and walkover surveys in suitable weather conditions and undertaken by a suitably qualified and experienced surveyor following appointment and instruction for the project. The most recent was completed in July 2023.
- 3.4 With regard to the site's archaeological interest or potential, information was gathered from within study area extending for up to 1km from its boundary as this was determined to be sufficient to understand its wider archaeological context and enable the results of this work to be evaluated within a broader framework.

ASSESSMENT OF SIGNIFICANCE

- 3.5 The assessment of significance of known/recorded archaeological remains within the site 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.

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 then lead to a loss of its 'significance'.
- 3.7 This assessment of potential indirect effects is made according to Cadw's guidance *Setting of Historic Assets in Wales* (published on 31 May 2017).
- 3.8 Setting *'includes the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape'* (Cadw, 2017). 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'*.
- 3.9 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'.
- 3.10 Set within this context, where the objective is to determine the potential for development to have an adverse effect on designated heritage assets beyond the boundary of a development 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. The 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.
- 3.11 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.

- 3.12 Therefore, the key issue to be determined is whether, and to what extent, the proposed development would affect the contribution that setting makes to the heritage significance of the asset under consideration, as per Stage 2 of the Cadw guidance.
- 3.13 Stage One of the setting assessment process was based on the application of a Zone of Theoretical Visibility (ZTV) to the site. This was projected from a height of c.90m, in order to give a maximum height which would allow for any tall elements of development, so as to provide a “worst case scenario” with regard to the visual impact of the proposals. The ZTV is reproduced on **Plan EDP 1**.
- 3.14 The projection is based on a Digital Surface Model (DSM) generated by LiDAR survey and thus represents a projection which takes into account, to a degree, the existing built form and trees, providing a guide to the possibility of being able to see elements of the proposed development from a given position. Although visibility is not necessarily a determining factor when assessing setting, it provides a sensible starting point.
- 3.15 Due to the surrounding topography, as well as the substantial industrial and domestic built form around the site, it was assessed that any designated assets beyond this 3km search area would be very unlikely to be adversely affected by the development within the site as a result of changes to their settings.
- 3.16 Assets located beyond 3km from the site are therefore not assessed within this report. This approach has been approved by Cadw via an email dated 27 July 2022 and this is reproduced as **Appendix EDP 2**.

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 historic parks and gardens.
- 4.2 There are 37 designated historic assets within the 3km study area. These comprise four Grade II* listed buildings, 31 Grade II listed buildings, two scheduled monuments and one Registered Park and Garden. These designated assets are shown on **Plans EDP 1, 2 and 3**.
- 4.3 The following section also details and contextualises the site's archaeological potential with reference to known archaeological assets and other records within a study area of up to 1km from the site boundary, as recorded by the GGAT HER.
- 4.4 As far as 'non-designated' archaeological assets are concerned, there are no monuments noted on the HER within the site boundary.
- 4.5 There are 69 HER records within up to 1km of the site and 24 records are held by the NMRW, not including those designated assets discussed separately. Inasmuch as these various records provide a context for the site's archaeological interest or potential, they are discussed below in the period specific sections.
- 4.6 Four archaeological events are also recorded by the HER within the 1km search area. These archaeological interventions are discussed below where relevant to the archaeological interest or potential of the site.
- 4.7 The locations of all the HER monuments, HER events and NMRW records described below are identified on **Plans EDP 4 and 5** respectively.
- 4.8 Also located within the boundary of the 3km study area is the Margam Mountain Landscape of Special Historic Interest, as defined by Cadw and GGAT. The location of this (registered) historic landscape is illustrated here on **Plan EDP 6**.

DESIGNATED HERITAGE ASSETS

Listed Buildings

- 4.9 There are 35 listed buildings that fall within the 3km study-area around site. These assets are discussed below, either individually or as a group with associated or nearby assets where relevant, for example those assets within the Registered Park and Garden (RPG) of Talbot Memorial Park. The assets are discussed with reference to their significance and the significance derived from their setting, as per Step 2 of the national guidance which is outlined in Cadw's *Setting of Historic Assets in Wales* (2017).

Listed Buildings within 500m

Former Harbour House

Significance of the Asset

- 4.10 Approximately 225m to the north-west of the site lies the Grade II Listed Former Harbour House (**23154**), located at the end of a spit within Port Talbot Docks (**Image EDP 1**).
- 4.11 The Former Harbour House is first visible on the 1st edition Ordnance Survey (OS) of 1876 and most likely dates to the latter half of the 19th Century. The harbour master's house was constructed in a central position on the Wharveside and was conveniently situated between New Dock and Old Dock, following the redevelopment of the area and opening of the new dock in 1898. The house is currently utilised as a centre for the Sea Scouts.
- 4.12 The harbour house is described within the Cadw listing citation as possessing the following external appearance:
- “Tudor-Gothic style. Large symmetrical 5-window building of 2 storeys and an attic. Advanced central gabled bay with barge boards and large finial. Constructed of coursed stone with quoins, replaced slate roof coverings and stone ridge stacks to ends and centre with moulded caps. Detail includes a plat band and openings with pronounced rusticated jambs and square hoodmoulds. The windows are lancets or flat-headed lights with horizontal glazing bars. The advanced central bay has 3-light windows, flat-headed to the lower storey and lancets above. Single lancet in gable. The S side of the gable at ground floor level has a single lancet, now blocked. The central bay is flanked by doorways with raised Tudor-arched heads, containing wooden doors with overlights. To the outer sides are 3-lancet windows. The upper storey has flat-headed windows, single-light above the doors and 3-light above the lancets. Narrow square headed attic light to S gable, and similar arrangement to N gable end. Brick lean-to to rear with segmental-arched window openings.”*
- 4.13 An analysis of the available desk-based information and the visit to the asset confirmed that the significance of the Grade II listed Former Harbour House is considered to principally stem from the evidential and aesthetic values of its built form and fabric.
- 4.14 As noted as a key reason for its designation by Cadw, the building remains as an unusual survival of a 19th Century Harbour House which retains its original character. Despite its current use as a Sea Scouts centre, the building has remained as a good example of a vernacular harbour master's house of this period.
- 4.15 The Former Harbour House also derives significance from its historic value, illustrating the role of Port Talbot Docks in the rising industrialisation of the South Wales area during the 19th Century, the focal role that the Harbour Master played in these industrial practices and its prevailing position following the redevelopment of the docks.
- 4.16 The building is also considered to derive some limited significance from its communal value, with the Harbour Master's House forming a focal point of organisation for those working within the docks. However, this value is somewhat depleted now that the building can only be accessed by the Sea Scouts and not the general public.

Contribution of Setting

- 4.17 The setting of the Former Harbour House is defined by its location on the edge of the Port Talbot Docks, immediately bounded by the water on its southern side, allowing outwards views from the house across the water to the south, likely with some limited views to the east and west. This setting, and the possibility to view the docks, enables an understanding of the building's purpose of overseeing the industrial practices being carried out across the docks, and is hence assessed as making a positive contribution to the asset.
- 4.18 To the immediate north, east and west of the Former Harbour House are additional small-scale buildings including a watersports centre to the west, as well as the large Dyfed Steels Ltd warehouse to the north-west. While these buildings have no historic or functional relationship with the harbour house, they reflect the ongoing industrial nature of the docks and thus make a neutral contribution to the setting of the asset. Beyond the immediate vicinity in these directions, the setting of the harbour house is defined by the built form of Port Talbot, Aberavon and Taibach; where once again, these residential and commercial buildings illustrate the rapid growth of the settlement from the industrial period onwards, and so thus make a neutral contribution to the building's significance.
- 4.19 To the south beyond the docks, the large built form of the Hanson Cement factory encompasses much of the experience from the Harbour House, as views to the wider industrial and brownfield land to the south are largely screened by the factory. While this modern construction represents a change to the original setting of the Harbour House, it is noted that at the time of the harbour house's construction, an engine house was situated in this location. As such, the cement factory simply reflects the continuous industrial use of the area and so makes a neutral contribution to the setting of the asset.
- 4.20 The harbour house is assessed as having a limited functional and historical inter-relationship with the site, in so much as the building was formerly designed to oversee the movements of workers within the docks, and, to a lesser extent, any movements in the immediate vicinity of the docks. This would include movements to and from the jetties along the edges of docks, which, to a very minor extent, would include movements via the tramway within the main parcel of site shown on the 1900 edition OS map, as well as the railway and mooring posts within the eastern parcel of Site illustrated on mid-20th Century OS maps. These transport lines have since be cleared from the site, and so no tangible evidence of this historic link remains. As such, while the land within the site may have once formed a minor part of the asset's setting that contributed to its significance, this is no longer clearly appreciable.
- 4.21 Due to the expansive presence of the cement factory, views between the main parcel of site, proposed for built development (PDZ), and the asset are screened by built form, with the exception of a single view towards the Harbour House achieved from the north-west corner. At present, this view is only achieved from the very north-west boundary of the site, given that any views from further south are screened by vegetation. This view from the boundary would thus remain unaffected by development within the site (**Image EDP 1**).
- 4.22 Given that the proposed development includes buildings of tall scale, such as storage tanks and processing plant, it is possible that there will be glimpsed views of such high points of the development within the site from the Former Harbour House, but these views would be

seen in the context of the already substantial form of the Hanson Cement Factory buildings and the existing tall chimneys (**Image EDP 2**). As such, any visual experience of the proposed development would simply result in glimpsed views of additional buildings within a view already dominated by industrial development.

- 4.23 There is, however, an existing visual relationship between the Harbour House and the western parcel of the Site, as well as the eastern parcel of the site, both of which are proposed as TCA (**Image EDP 3 - 4**).
- 4.24 In light of the commentary above, the potential for the proposed development to impact upon this Grade II listed building (indirectly and through changes to its setting); as well as the nature, magnitude and timing/duration of any impacts on it; will be considered and appropriately assessed below in **Section 5**.

Listed Buildings within 1km

Church of St Theodore

Significance of the Asset

- 4.25 Approximately 300m to the north-east of the site lies the Grade II* Listed Church of St Theodore (**14160**), located within the settlement of Taibach (**Image EDP 5**).
- 4.26 The church was designed by renowned architect John Loughborough Pearson and was constructed in 1895-7 at the expense of Emily Charlotte Talbot of Margam Park. The church also replaced the chapel of ease, now Holy Cross Church, which had become too small for the expanding population of Port Talbot.
- 4.27 The Church of St Theodore is described in the Cadw listing citation as being constructed in the Early English style, comprising a nave, north and south aisles, porches and transepts, sanctus bellcote, chancel, south lady chapel and north vestry. The church is constructed of local blue-grey snecked sandstone, with Bath stone dressings under tile roofs.
- 4.28 The more intricate detailing of the exterior of the church includes:
- “Angle and set-back buttresses with offsets and gablets, moulded plinth and sill bands, continuous hoodmoulds and decorated eaves cornice.” The church also has a decorative porch entrance with “pointed arched entrance with 3 orders of chamfered mouldings on 3 attached shafts with rings. Steel gates to entrance. Pairs of windows to each side, 2-lancet with a circle above.”*
- 4.29 The decorative Lady Chapel and sanctus bellcote are also described as follows:
- “Apsidal-ended lady chapel partly obscuring S side of chancel which has lancet windows at high level. The lady chapel has 5 windows to the S and E, each separated by a buttress. Plate tracery windows with 2 lancets and a circle. Dressed stone sanctus bellcote above crossing, of square-section with spirelet, angle pilasters and pinnacles. Two flat-headed openings to each side with decorative friezes above and below. The E end of the chancel has 3 tall stepped lancets in heavy mouldings. flanked by massive angle buttresses. Smaller*

buttress centrally placed below sill. The window is under a high pointed relieving arch, immediately beneath which are 2 ornate blind quatrefoils. Pair of vents in gable apex.”

4.30 The vestry comprises a tall two-storey gabled bay with a single-storey lean-to on left hand side, where the citation states it contains “*plate tracery windows with 2 lancets and a quatrefoil*” as well as a “*pointed arched doorway to the right with several orders of mouldings*”. The north transept has “*large set-back buttresses without gablets and 2 tall lancets between which is an angle buttress*”.

4.31 The citation also notes a porch in the transept with the following architectural details:

“Pointed arched entrance with 2 orders of chamfered mouldings on 2 attached shafts with rings. Above is a statue niche with trefoiled head on shafts and foliate moulding above head. It contains a statue of St Theodore. Each side of the porch has 2 quatrefoils within heavy mouldings. Inside the porch is a pointed arched doorway with single shafts, containing double boarded doors. Quadripartite vaulted roof and side benches. The N side of the proposed tower chamber has a tiny stairlight to the R angle buttress.”

4.32 An analysis of the available desk-based information and the visit to the asset confirmed that the significance of the Grade II* listed St Theodore Church principally stems from the evidential and aesthetic values of its built form and fabric. As noted as a key reason for its designation by Cadw, the building remains a “*powerful example of the Early English style in late Victorian architecture*” and these particular architectural and decorative features are best experienced from its south-western frontage.

4.33 The church also derives a large level of significance from its historic value, as the largest church in Wales designed by the nationally important architect John Loughborough Pearson. The construction of the church, and its requirement to replace the earlier Chapel of Ease, also clearly serves to illustrate the rapid growth of the local population of Taibach during the industrialisation of the late 19th Century.

4.34 The building is also considered to derive some significance from its communal value, as a community church that still provides a place of worship for the local population.

Contribution of Setting

4.35 The setting of St Theodore Church is defined by its churchyard, which encompasses the church in all directions (**Image EDP 6**). The churchyard comprises open green space with vegetated boundaries to the north-east and south-east. This setting provides an attractive, peaceful space for the attending congregation, as well as allowing the original boundary plot of the church to remain clearly demarcated and understood and forming the best place from which to appreciate its significance. This is thus the element of the church’s setting which contributes most to its significance.

4.36 To the immediate north-west lies a small community centre, now used as a Scout meeting hall; this building is originally noted within early 20th Century OS mapping as a Mission Room associated with the church. Beyond this lies the vicarage of the church. These buildings thus allow an appreciation of the Church’s wider community influence and accordingly contribute positively to its setting.

- 4.37 To the north-east and south-east lies the Talbot Memorial Park RPG. This park is defined by green space and densely vegetated boundaries, acting as a continuation of the green space of the churchyard and providing a somewhat secluded and rural setting for the church within the wider developed settlement of Taibach.
- 4.38 Beyond the immediate vicinity in all directions, the setting of the church is entirely defined by the built form of Taibach. These residential and civic buildings illustrate the rapid growth of the settlement from the industrial period onwards and allow the church's purpose as a community place of worship to be easily appreciable. This settlement can therefore also be considered to make a positive contribution to the setting of the listed building.
- 4.39 No historical or functional relationships between the church and the formerly industrial parcel of land which forms site have been identified.
- 4.40 In terms of any visual relationships between the two, any views outwards from the main parcel of site (PDZ) are screened by the current vegetation within the boundary, although it is likely that on the removal of any vegetation, views in this direction would still be screened by the intervening built form of Taibach (**Image EDP 7**). While the church has a small bellcote extending from the rood at the eastern end, this is not of such height that it forms an eye-catching landmark feature that is visible from a wider area than the main body of the church. As such, this highest point of the church remains screened from the main parcel of site.
- 4.41 There are, however glimpsed views of the Church from the TCA at eastern edge of the main parcel within the Site (Davies Crane Hire) (**Image EDP 8**), as well as from the TCA forming the eastern parcel of the site, although these are largely obscured by the surrounding built form and intervening vegetation and so are limited to the roof of the church. As such, these views are distant, in the case of the Davies Crane Hire parcel, or largely obscured in the case of the eastern parcel, so do not allow for an appreciation of the evidential and aesthetic value of the Church. Given that the Church is divided from the site by a substantial amount of built form, these inwards views are not considered to be in any way designed, and instead are considered to be entirely incidental. As such, these obscured views of the Church are not considered to make a positive contribution to its significance.
- 4.42 Views towards the site from the church are screened by the adjacent rows of housing immediately to the south-west (**Image EDP 9**). Given the absence of any visual or historical connections, the land within the site is not considered to form any part of the asset's setting that contributes to its significance.
- 4.43 Given the scale of development, it may be possible to obtain glimpsed views of high points of the development within the site, such as storage tanks and processing plant, from the church. However, such views would be seen in the context of the already tall chimneys of the large Tata Steel Industrial Plant, which are visible from the church. As such, any visual experience of the proposed development would simply result in glimpsed views of additional buildings within the current backdrop of industrial development.
- 4.44 It is therefore assessed that development within the site is likely to result in a very minor change to the setting of the Grade II* listed Church of St Theodore through glimpsed views of the high points of this new development. However, it is assessed that these limited partial

views would be in the context of the already industrial setting. These very minor changes can therefore be considered to have no effect upon the already industrial wider setting of the church and would not negatively impact upon its significance.

Listed Buildings within Talbot Memorial Park RPG

Significance of the Assets

- 4.45 The Talbot Memorial Park RPG, located c.300m east of site, contains one Grade II* listed building (the War Memorial **23256**) and four Grade II listed buildings; which are Lodge 1, Talbot Memorial Park (**23260**), Lodge 2, Talbot Memorial Park (**23259**), Gateway to Talbot Memorial Park (**23255**), the Fountain in Honour of John Hopkin Davies (**23257**) and finally the Bandstand (**23258**) (**Images EDP 10 – 12**).
- 4.46 The Grade II* listed War Memorial comprises a bronze work stature sculpted by renowned sculptor Louis Frederick Roslyn in 1925. The statue is of the Angel of Victory, holding a wreath in one hand and a small winged victory in the other. The statue sits on a granite pillar with a bronze plaque on each side; the south panel of the plaque contains an inscription reading *“To the glory of God in memory of our honoured dead who fell in the Great War”*. The east panel bears a figure of a naked young man holding a sword in one hand and a wreath in the other, with a scene of men in action above. To the north is *“a robed woman in relief (peace) flanked by a small child and a lamb. Doves fly in the sky above and underneath is an inscription ‘The peace of God’ ...”*. To the west the panel shows a robed figure of remembrance, with scenes above of soldiers bearing stretchers and lines of graveyard crosses.
- 4.47 The memorial is designated by Cadw on account of its artistic interest as a *“bronze sculpture of particular artistic and iconographic interest”*, as well as its historic value commemorating the Great War.
- 4.48 The Grade II listed Lodges which collectively mark the east and west edges of the entrance to the park were constructed in 1925 and are dedicated to the war hero, Rupert Price Hallows VC (1881-1915). The two matching lodges are described in the Cadw citation as being *“constructed of coursed grey rock-faced stone with pale stone dressings, under a replaced slate covered roof”*. A number of decorative features are also noted including the plinth with dressed and chamfered coping and a:

“Prominent pale stone roundel in gable with Port Talbot coat of arms and an inscription, ‘Borough of Port Talbot’”.
- 4.49 The significance of this pair of lodges is primarily derived from the evidential and aesthetic value of their built fabrics and form, as well as the historic value given their construction in 1925 for the Memorial Park to commemorate the Great War.
- 4.50 The Grade II listed Gateway to the Park is also dedicated to the war hero, Rupert Price Hallows VC (1881-1915). It is described in the Cadw citation as follows:

“Triple-arched gateway of pale ashlar stone. Wide centrally-placed Tudor arch with reeded moulding, flanked by narrow pointed arches with similar mouldings. Spandrels and areas above arches composed of giant voussoirs. Pilasters between arches and to angles with

recessed lancets and polygonal mouldings to edges. Cornice across top in similar style, bearing the inscription 'Talbot 19 Memorial 25 Park'. Raised frieze above central arch with recessed quatrefoils in circles, moulded coping and flanking octagonal pinnacles with advanced lancets to 4 sides. Metal gates to arches with alternating plain and twisted uprights, ending in tall fleur-de-lis finials and small wave finials, respectively. Arched heads below top rails, lock bar with scrolls and 3-leaf motifs. The walls of the gateway return to the N, each with a narrow pointed arch, and join the 2 identical lodges. Low rock-faced walls surmounted by metal railings run outwards from the front angles of the entrance terminating in dressed octagonal piers with pinnacles matching those on the frieze above cornice."

4.51 The gateway is designated on account of the evidential and artistic interest of its architectural features, representing an elaborate gateway in the Gothic style. The gateway also derives significance from its historic interest as a memorial to the First World War.

4.52 The fountain within the RPG is in honour of the doctor, John Hopkin Davies, who practised in Taibach for 48 years until his death in 1920 and was an admired member of the community. The fountain was erected before his death, in 1910, through money raised by public subscription. The Cadw citation notes this as a "rare honour". The fountain was originally sited near the old police station in Tai Bach, but was moved to its current position in 1926 when the memorial park was laid out.

4.53 The fountain was designed by Sir W Goscombe John RA and is described by the Cadw citation as follows:

"Granite water fountain with bronze sculpture. Two square piers support a lintel with round arched head. The piers are slightly tapering with moulded bases and Tuscan-style capitals with dentils. The lintel has a pronounced hollow moulding to the underside. Underneath the arch is a stone panel. To the front (S), the upper half bears a bronze bust of John Hopkin Davies. On its L side in relief is 'John Hopkin Davies 1910'. Underneath is a semi-circular water trough with a wide rim and base, the latter continuing from the pier bases. To the rear, the stone panel beneath the arch bears an inscription, 'This fountain erected to John Hopkin Davies, M D, J P, of Tir Caradoc, Port Talbot, by his many grateful friends and admirers, amongst whom he laboured with unfailing kindness for many years, July 1910'. Underneath, a bronze fountain spout has been mounted in the form of 2 stylised rams heads. Plain semi-circular trough below. All mounted on a platform one course high with central semi-circular projections to front and rear."

4.54 The Grade II listed fountain primarily derives its significance from the artistic interest of its intricate and aesthetically impressive detailing, as well as the historic interest of its design by a pre-eminent Welsh sculptor of the period. The fountain derives further historic interest of its commemoration of the locally revered Dr John Hopkin Davies.

4.55 The final listed building within the park is the Grade II listed Bandstand; the building is described in the Cadw citation as follows:

"Octagonal bandstand with cast iron columns supporting a domed roof with cupola. Low red brick plinth with concrete coping continuing as floor. Four concrete steps to W side, bounded by replaced red brick walls with short square end piers. Eight ornate circular

columns with bases as vases with foliate decoration in relief, rings and beading, and with foliated voluted capitals. The columns are supported on high fluted and ringed pedestals, between which are panels of cast iron openwork railings. These are decorated with scrollwork and flower bosses, with squares to the dog rails. The columns support segmental-arched cast iron panels with scrollwork and flowers in the spandrels. Pendant finials to centres of arches. The eaves project and are partially supported by brackets at right angles to the arched panels and in the same style. The domed roof is lead covered to the exterior and timber boarded to the underside. Small centrally-placed ceiling rose with scrolled decoration. Moulded cast iron eaves with raised open scrollwork and tall finials at the angles. The lead-covered cupola, a smaller dome, is surrounded by an openwork cast iron frieze and supports a weather vane.”

- 4.56 The bandstand is designated on account of it being a “*little altered example, with fine detail, of an increasingly scarce building type*”, and so hence its significance is for the most part derived from the evidential and aesthetic value of its built fabric and form. The bandstand also derives a level of historic interest given its construction in the memorial park commemorating the Great War.
- 4.57 Each of these listed buildings within the park also derives further significance from their group value as a number of associated buildings, as well as the communal value derived from their location within a publicly accessible space of recreation and beauty.

Contribution of Setting

- 4.58 The setting of each of these assets is first and foremost the Talbot Memorial Park RPG in which they are situated and can be appreciated as a group. The RPG itself is discussed further underneath.
- 4.59 The park entrance is clearly indicated by the elaborate gateway and mirroring pair of lodges; the park then contains a wide central tarmac path which leads north-eastwards, designed to take in views and allow movement past the War Memorial statue and bandstand beyond. Either side of the tarmac path are open green lawns with specimen trees including sycamore (*Acer pseudoplatanus*), monkey puzzle (*Araucaria araucana*), birch sp. (*Betula* sp.), holly sp. (*Ilex* sp.), oak sp. (*Quercus* sp.) and cherry (*prunus*), as well as flower beds. A small side path leads off this main walkway to take in the fountain dedicated to Dr John Hopkin Davies.
- 4.60 To the north-east and north-west, the park is defined by vegetated hedgerows, separating it from a children’s playground and tennis courts (**Image EDP 13**).
- 4.61 The park is therefore well bounded on all sides by vegetation, forming a well secluded and peaceful area within an otherwise urban centre. This quiet, green space therefore allows the assets within the park, and their purpose as thought-provoking memorial features, to be best understood and appreciated.
- 4.62 Beyond the park itself, the setting is defined by further open and green space to the north and west, comprising ball courts and playing fields to the north, a children’s play area to the west, as well as the courtyard of St Theodores to the west. This extending green space allows a continued appreciation of the assets within the memorial park, separated from the bustle and noise of the wider urban settlement.

- 4.63 Beyond this, in all directions, the wider setting of the assets in Talbot Memorial Park RPG is defined by the residential and civic built form of Taibach. This setting contributes to the significance of the park in so much as it allows an understanding of the communal function of the park, providing a place of Memoria for the local community.
- 4.64 No historical or functional relationships between any of the listed buildings located within Talbot Memorial Park RPG and the formerly industrial parcel of land which forms site have been identified.
- 4.65 In terms of any visual relationships between the two, any views outwards from the site are screened by the current vegetation within the boundary, although it is likely that on the removal of any vegetation, views in this direction would still be screened by the intervening built form of Taibach.
- 4.66 Views towards the site from the assets in the park are initially framed by the gateway and opposing lodges, views beyond the gateway are screened by the row of housing immediately south-west of the RPG, as well as Duffryn Chapel (**Image EDP 14**). In view of the lack of any visual or historical relationships, the land within the site area is not considered to form any part of the assets' setting which contributes to their significance.
- 4.67 Given the scale of development, it may be possible to obtain glimpsed views of high points of the proposed development within the site, such as storage tanks and processing plant, from the park. However, these views would be seen in the context of the already tall chimneys of the large Tata Steel Industrial Plant, which are visible in glimpsed views beyond the park gates. As such, any visual experience of the proposed development would simply result in glimpsed views of additional buildings within the current backdrop of industrial development in the asset's wider surroundings.
- 4.68 These very minor changes can therefore be considered to have no effect upon the already industrial wider setting of the asset and would not negatively impact upon its significance.

Dyffryn Chapel

- 4.69 Approximately 200m north-east of the site lies the Grade II listed Dyffryn Chapel (**23253**), located within the settlement of Taibach (**Image EDP 15**).
- 4.70 Dyffryn Chapel is a Classical-style chapel dated to 1893, where it replaced an earlier chapel on the site which dated to 1841. The chapel is currently disused.
- 4.71 The Chapel is assessed as principally deriving its significance from its evidential and aesthetic value of its features. These features are best appreciated from its polite southern frontage, described within the Cadw citation as a Classical-style gable end façade constructed of snecked rock-faced grey stone with prominent Bath stone dressings. The chapel also derives significance from its historic value as a Methodist Chapel, which was constructed to meet the needs of a growing population after the expansion of the Port Talbot area during this era of industrialisation. This purpose also illustrates the communal value of the chapel, serving the local population.

Contribution of Setting

- 4.72 The setting of Dyffryn Chapel is primarily derived from its roadside setting within the settlement of Taibach, forming part of the wider street scene. This urban setting, surrounded by residential buildings and additional civic buildings which collectively make up the Taibach community, allows for an understanding of the Chapel's historic purpose, serving the local population, and thus contributes positively to its significance.
- 4.73 The wider setting of the Chapel includes Port Talbot Docks and the site to the south-west; this industrial area is of no historic or functional relevance to the Chapel beyond illustrating the expansive development of the area during the 19th Century onwards. The site is therefore not considered to form part of the setting of the Chapel which contributes to its significance.
- 4.74 In terms of inwards views, the site visit established that the Chapel is entirely screened from the main parcel of site PDZ and northern parcel of site within the Docks, due to the surrounding built and vegetated form. There are, however, glimpsed views of the Chapel from the TCA which forms the eastern parcel, but these are largely obscured by the surrounding built form and intervening vegetation and do not allow for an appreciation of the evidential and aesthetic value of the Chapel (**Image EDP A1.8**). Moreover, they are of the south-west façade, rather than the south-east frontage, and are considered to be entirely incidental, rather than a designed view. As such, these obscured views of the Chapel are not considered to make a positive contribution to its significance.
- 4.75 Views outwards from the Chapel towards all parcels of the site are currently screened by the intervening built form (**Image EDP A1.16**), namely the residential development around West End to the south-west, the vegetated route of the railway line and the A421 to the south.
- 4.76 While there may be very partial views of the high points of the proposed development, such as storage tanks and processing plant, from the Chapel, it is noted that chimneys and other high points of the current industrial development surrounding the docks can already be seen from this asset. As such, any glimpses of the proposed development would be in the context of a visual experience which is already defined by a backdrop of industrial buildings.
- 4.77 Such very minor changes can therefore be considered to have no effect upon the already industrial setting of these assets and so would not negatively impact upon their significance. This asset is therefore not considered to be sensitive to the proposed development and is not discussed further.

Other Listed Buildings in Taibach

- 4.78 Within the settlement of Taibach, and outwith the Talbot Memorial Park RPG, are three additional Grade II listed buildings; these comprise:
- Carnegie Free Library (**22807**) (**Image EDP 17**) located 300m east of the site;
 - Gibeon Chapel (**21489**), located c.500m east of the site; and
 - A milepost (**22808**) (**Image EDP 18**) located 600m south-east of the site.

- 4.79 Carnegie Free Library, which was built in 1916 by Margam Urban District Council, derives its significance primarily from the evidential and aesthetic value of its built fabric and form. These features are best experienced from the buildings polite western frontage which are summarised from the Cadw listing description as comprising a two-storey building with a five-window frontage with a central entrance bay comprising a high segmental pediment, which in turn is flanked by balustraded parapets with end piers surmounted by ball finials. The building is primarily constructed of rock-faced coursed grey stone with contrasting with pale stone dressings and comprises a hipped roof behind the parapets with replaced slates. The library also derives a level of historic and communal value from its continued use as a library, serving the local community which rapidly expanded during the industrialisation of the area during the 19th and early 20th Century.
- 4.80 Gibeon Chapel is a Classical-style chapel dated to 1909-10, where it replaced an earlier chapel on the site which dated to 1861. The Chapel is assessed as deriving its significance from its evidential and aesthetic value of its features, these features are best appreciated from its polite southern frontage. The chapel also derives significance from its historic value as an Independent Chapel, which was located in the centre of the community, illustrating the historic and communal value of the chapel, as an independent chapel serving the local population.
- 4.81 The mile post forms one of a group of mileposts associated with the turnpiking of the Swansea to London road (now A48). It is constructed in an unusual ornate Gothic style, comprising an iron post painted white with black lettering and detail, with a "*pointed arched head with mouldings, imposts and keystone*" as detailed in Cadw's listing citation. The post derives a level of significance from the aesthetic value of its unique gothic style, however its principal reason for designation is its group value with associated mile posts, and this its historic value as a characteristic feature of the turnpike road.
- 4.82 It is assessed that in each case the principal aspect of the setting of these buildings which contributes to their significance is the streetscape of the surrounding town. The importance of the chapel and library is largely derived from the historic and communal value given their role serving the local town. As such, the immediate setting of residential buildings and additional civic buildings which collectively make up the Taibach community contribute to the significance of the buildings.
- 4.83 Their wider setting, which includes additional residential development of Margam to the south and Port Talbot to the north, with Port Talbot Docks and the site to the west, are of no historic or functional relevance to the buildings beyond serving to illustrate the expansive development of the area during the 19th Century onwards. This is particularly relevant when considering the milepost, the setting of which can be defined as the road in which it is sited, rather than any distant parcel of land. The site is therefore not considered to form part of the setting of these buildings which contributes to their significance.
- 4.84 Regarding any visual experience of the site, it is noted that any views outwards from the site, or in from the assets at Taibach, are currently screened by the intervening built form, namely the residential development of Taibach itself, as well as the industrial buildings of Tata Steel, immediately west of site (**Image EDP 19 – 21**).

- 4.85 While there may be partial views of the high points of the proposed development, such as storage tanks and processing plant, it is noted that chimneys and other high points of the current industrial development surrounding the docks can already be seen from each asset. As such, any glimpses of the proposed development would be in the context of a visual experience which is already defined by a backdrop of industrial buildings.
- 4.86 Based on this assumption, which will need verifying on the finalisation of the scheme, these very minor changes can therefore be considered to have no effect upon the already industrial setting of these assets and so would not negatively impact upon their significance. These assets are therefore not considered to be sensitive to the proposed development and are not discussed further.

Magistrates Court

The Asset and its Significance

- 4.87 Located to the north of the site, approximately c.800m from its boundary, is the Magistrates Court (**23152**) (**Image EDP 22**).
- 4.88 The building was originally constructed as the General Offices of the Port Talbot Steel Company in the early 20th Century, but in 1988 it was converted to a Magistrates Court and opened by Lord MacKay of Glasfern.
- 4.89 The exterior features of the building are described within the Cadw Citation as follows:

“Neo-Georgian style. Main range with end wings which are advanced to the front. Constructed of red brick in stretcher bond, suggesting double skin construction. Pale stone dressings including plinth and rusticated quoin strips to wings. Hipped tiled roofs with swept eaves, with individual roofs to the main range and each wing. The front of the main range is 7-window while the wings are 3-window. Horned multi-pane sash windows throughout with stone sills and flat gauged brick heads with keystones. Central bay with doorway and stairlight above, flanked by narrow 4-over-4-pane sash windows, under a raised segmental pediment. Doorcase with tapering pilasters, moulded capitals and wide flat cornice, containing double panelled doors with overlight. This supports a pronounced stone tablet which rises to the sill of the stairlight above and reads 'Port Talbot/Magistrates Court.' The round-headed stairlight has a moulded stone surround with ears and large inverted volutes against the jambs. A large fluted and scrolled keystone supports a keyed oculus in the pediment which has moulded stone drops to the sides. The windows flanking the central bay are 8-over-8-pane sashes, except for the outer ground floor windows which are paired 4-pane sashes. The front elevations of the wings are symmetrical with 8-over-8-pane sashes flanked by 6-over-6-pane sashes, all the windows openings with aprons. Added range to L, with large catslide section and no openings. The N side of the N wing is also 3-window with 8-over-8-pane sashes, but those to the lower storey are not aligned with those above. The L and central lower windows have aprons beneath. The rear is rendered and altered. Flat roofed projection behind main range with lean-to to R. Mainly UPVC windows, irregularly spaced. The added bay to the S end is similar, with flat-roofed projection to rear, probably a staircase bay, and irregular windows.”

- 4.90 An assessment of the available desk-based information and site visit established that the significance of the asset is primarily derived from the evidential and aesthetic values of its built fabric and form. The asset is a good example of an early 20th Century industrial office building, which has experienced little external alteration. The asset's aesthetic aspects are best experienced from its polite eastern frontage.
- 4.91 The asset also derives significance from its historic value as the former head offices of a nationally important company, and as it represents the only surviving building of the Port Talbot Steel Company. A level of communal value is also derived from the building's new use as a Magistrates Court, which supports its ongoing preservation.

Contribution of Setting

- 4.92 The principle setting of the Magistrates court is its immediate grounds comprising a car park, which wraps around the building in its entirety, as well as a modern ancillary building used for activities associated with the courthouse. The surrounding car park has limited green landscaping and vegetation planting to the east, where it is then bounded by Oakwood Road and Cramic Way. Beyond this, to the north and east, are the residential and civic buildings of Port Talbot, divided from the courthouse by the Talbot Parkway railway line. This setting contributes to the significance of the building in so much as it allows the communal value of the building to be understood, as a civic building within the town.
- 4.93 To the west and south the court is surrounded by brownfield site, on which the former Port Talbot Steel Works used to be situated. While there is no longer any extant evidence of the works remaining, this open space allows a level of understanding of the breadth of the former steelworks, and thus contributes a level of significance to the asset.
- 4.94 Further to the south, the wider setting of the building includes the Port Talbot Docks, and the industrial land beyond this, which includes all parcels of the site (**Image EDP 23**). This land has a very limited historical association with the Magistrates Court by allowing a sense of its formerly industrial purpose to be appreciated. As such, the land within the site is considered to form a very minor part of the asset's setting that contributes in a positive way to its significance.
- 4.95 Due to the expansive presence of industrial buildings in the asset's surroundings, including the industrial park at Llewellyn's Quay to the south-east and the Hanson cement factory to the south-east, views between the site and the Grade II listed building are screened out by intervening built form (**Image EDP 23 - 24**).
- 4.96 It is nonetheless anticipated that it may be possible to obtain glimpsed views of high points of the development within the site from the Magistrates Court, such as storage tanks and processing plant. These views would be seen in the context of the already substantial form of the Hanson Cement Factory buildings and further industrial buildings and tall chimneys. As such, any visual experience of the proposed development would simply result in glimpsed views of additional buildings within a view already dominated by industrial development.
- 4.97 Furthermore, these potential obscured views outwards towards the site can only be obtained from the rear of the magistrates court (west), rather than its polite eastern frontage. Given the concentration of architectural features and windows on the front

elevation of the court, it is considered that views from the rear are of less relevance to its current function as a civic building, with views focused towards the heart of the town.

- 4.98 In light of the commentary above, the potential for the proposed development to impact upon this Grade II listed building (indirectly and through changes to its setting); as well as the nature, magnitude and timing/duration of any impacts on it; will be considered and appropriately assessed below in **Section 5**.

Plaza Cinema

Significance of the Asset

- 4.99 Located to the north of the site, approximately c.900m from its boundary, is the Plaza Cinema (**22136**) (**Image EDP 25**).
- 4.100 The Cinema was constructed in 1939 and then opened at easter 1940. The architectural features of the cinema are recorded in the Cadw citation as follows:

“Modernist style with Art Deco influences. Front elevation in cream faience tiling with band in eau-de-nil; leadwork scallops below capping of parapet; tiles painted black beneath canopy. Projecting central block with partially obscured tripartite window (metal glazing bars), projecting turrets to ends; side elevation to R has 2 broad windows on 2 levels (metal glazing bars where visible); side elevation to L has 3 windows at upper level, and broad window below. Walls to sides, screening body of cinema, also faced in faience. Original full-width canopy, entrance doors boarded over; to each side, doors and semi-circular convex shopfronts. Plain roughcast side elevations with tall ribs and small windows infilled with concrete. Large lean-to to rear.”

- 4.101 The site visit, in conjunction with this desk-based information, established that the significance of the cinema primarily stems from the evidential and aesthetic values of its built form and fabric.
- 4.102 The cinema is considered by Cadw to be a “very rare example in Wales of a building type which expresses the distinctive architectural vocabulary of 1930s cinema architecture”.
- 4.103 The cinema derives a level of significance from its historic value, with the influence of World War Two upon its construction well understood. Its function as a cinema, providing a place of entertainment for the local community and especially during wartime periods of adversity, also offers a level of communal value to this asset.

Contribution of Setting

- 4.104 In terms of the setting of the cinema, it is assessed that the principal setting is the street scape of the surrounding town. The importance of the asset is largely derived from the historic and communal value given its role serving the local town. As such, the immediate setting of residential buildings and additional civic buildings which make up the Port Talbot community contributes to its significance.
- 4.105 The wider setting includes additional residential development of Taibach to the east, and Aberavon to the west, as well as Port Talbot Docks and the site to the south. None of these distant settlements and industrial areas hold historic or functional relevance to the building.

The site is therefore not considered to represent part of the setting of this asset that makes a contribution to its heritage significance.

- 4.106 It is noted that views between the cinema and the site are screened by the intervening built form, namely the large petrol station immediately opposite the cinema and the residential development of Port Talbot itself, as well as the industrial buildings of Llewellyn Quay to the northern edge of the docks (**Image EDP 26**). While there may be partial views of the high points of the proposed development, such as storage tanks and processing plant, it is noted that given the large distance from the site, as well as the overbearing form of the petrol station opposite the cinema, it is unlikely these would represent more than very small features in the distant background.
- 4.107 As such, any glimpsed, distant views of the high points of the development, within the context of an already industrial backdrop, are anticipated to result in no change to the setting of the cinema and so would not negatively impact upon its significance. This asset is therefore not considered to be sensitive to the proposed development and is not discussed further.

Plate Girder Bridge

- 4.108 Located to the west of the site, and along the River Avon, is the Grade II listed Plate-Girder Bridge (**23153**), c. 315m from site (**Image EDP 27**).
- 4.109 The Plate Girder Bridge is a two-carriageway road bridge built in 1903 following the major development of Port Talbot docks in the late 1890s. The bridge provided the main access to the docks from Aberavon and the west side of the river.
- 4.110 The architectural features of the bridge are described by the Cadw citation as follows:

“Long 3-arch plate-girder bridge with wide deck. The piers and abutments are of snecked stone, the piers continuing as cut-waters. Angled abutments with quoins and concrete copings. The parapets are divided into 3 sections, one to each arch. Each section contains 1 row of riveted wrought iron plates under a top rail which curves down at the ends. The gap between each section is infilled with narrow iron railings with fleur-de-lis finials. The parapets of the central section are slightly raised and have a narrow top rail. An oval iron plaque is mounted in the centre of the S face but is not decipherable. The flanking sections have heavy riveted top rails. Open iron handrails are mounted on the parapets. These have circular posts, top rail and mid rail and small ball finials. The abutments, which continue into the river banks, support similar railings. The ends of the bridge are marked by large square stone piers with moulded arched capstones with margin drafting. The S piers support large decorative iron vases with finials (those to N piers may be missing). A large stone tablet is mounted on the inside face of the NW pier. It reads 'This bridge was erected by the Aberavon Corporation and opened by Sir Arthur Vivian KCB/October 29 1903/ Engineer, J Roderick/Contractors, Clark & Co./Major T A Burgess/Town clerk, M Tennant'. A further pier is located at the NE end of the E abutment. The wide 2-carriageway deck has pavements to each side.”

- 4.111 The site visit and analysis of desk-based information established that the significance of the bridge was in large part derived from the evidential and aesthetic values of its built form, representing an example of a finely detailed plate-girder bridge. The Cadw citation notes that this evidential value has an additional interest when considering that it is unusual for a plate-girder bridge of this date to carry a strategic road rather than a railway. The bridge also derives historic value from its association with the development of Port Talbot docks.
- 4.112 With regard to the setting of this asset, it is considered that this is principally focussed on the River Avon, along which it is situated, as well as the Port Talbot Docks to the immediate west. These waterways allow for an understanding of the purpose of the asset allowing the movement of goods towards the docks.
- 4.113 Its wider setting includes the industrial grounds immediately surrounding the docks, which includes the site. This has a limited historic association with the bridge in so much as it illustrates the industrial nature of the area. As such, the land within the site is considered to form a very minor part of the asset's setting that contributes to its significance.
- 4.114 In terms of the visual relationship between these assets and the site, it is noted that views outwards from the site are currently screened by the existing vegetation (**Image EDP 28**). However, it is considered likely that once any vegetation is cleared, the large distance and sporadic intervening industrial buildings will prevent any views outwards being obtained. No views inwards from the bridge were obtained towards site, given the large gates marking the entrance to the bridge, as well as the built form of the harbour house and large buildings of the Hanson Cement Factory (**Image EDP 29**).
- 4.115 While glimpsed views of the high points of the development may be possible, these views would be very distant and seen in the context of the already substantial form of the surrounding industrial buildings. As such, any visual experience of the proposed development would simply result in distant glimpsed views of additional buildings within a view already dominated by industrial development.
- 4.116 In light of the commentary above, the potential for the proposed development to impact upon this Grade II listed building (indirectly and through changes to its setting); as well as the nature, magnitude and timing/duration of any impacts on it; will be considered and appropriately assessed below in **Section 5**.

Listed Buildings within 3km

Harbour Watch-Tower

- 4.117 Located to the west of the site, and along the River Avon is the Grade II listed Harbour Watch-Tower (**23155**), located c.850m from the western parcel (**Image EDP 30**).
- 4.118 The Harbour Watch Tower is considered to date to the mid-19th Century, as it pre-dates the major redevelopment of the docks by the Port Talbot Railway and Docks Company from 1894-8, as evidenced on the 1883 1st Edition OS map.

4.119 The architectural features of the Watch Tower are described by the Cadw citation as follows:

“Two-storey octagonal watch-tower with battlemented parapets. Constructed of stone, the lower storey of coursed rubble with quoins, the upper storey of dressed stone. The parapets consist of a moulded coping supporting dressed crenellations at the angles. The front faces W towards the sea and contains a doorway with segmental head of voussoirs and a wooden door frame. Window opening above with similar head, and 2 matching windows to the flanking faces. Two further upper storey windows to S and NE faces, tall and rectangular with flat heads. The door and glazing do not survive.”

4.120 Due to its location within the Tata Steel Complex, the watch tower was not able to be visited during the site visit dated 14 July 2022. However, an overview of the desk-based information indicates that the significance of the tower is derived principally from the evidential and artistic interest of its built fabric and form; the building remains a well-preserved example of the shell of a 19th Century Harbour Watch Tower and is a prominent feature in the coastal landscape. The asset also derives a level of historic interest for its function as a watch tower during the rapid growth of industry at Port Talbot Docks during the 19th Century.

4.121 With regard to the setting of this asset, it is considered that this is principally focussed on the River Avon, along which the asset is situated, as well as the Port Talbot Docks to the immediate west. These waterways allow an understanding of the fundamental purpose of the asset allowing the surveillance of the docks and its immediate surroundings.

4.122 Within the wider extent of this setting, this includes the industrial grounds immediately surrounding the docks, which includes the land forming the site. This land has a limited historic association with the watch tower in so much as it illustrates the industrial nature of the area. As such, the land within the site is considered to form a very minor part of the asset's setting that contributes to its significance.

4.123 In terms of the visual relationship between these assets and the site, it is noted that views outwards from the site are currently screened by the existing vegetation. However, it is considered likely that once any vegetation is cleared, the large distance and sporadic intervening industrial buildings will still prevent any views outwards (**Image EDP 31**).

4.124 Views towards the site from the watch tower are currently screened by the existing form of Puckey House (Harbourmaster's office) to the east, as well as intervening vegetation, with a backdrop defined by the large industrial buildings of the Hanson Cement factory and the Tata Steel Works (**Image EDP 32**). While it may be possible to obtain glimpsed views of the highest points of the development within the site from the asset, these views would be very distant and seen in the context of the already substantial form of the surrounding industrial buildings. As such, any visual experience of the proposed development would simply result in distant glimpsed views of additional buildings within a view already dominated by industrial development.

4.125 In light of the commentary above, the potential for the proposed development to impact upon this Grade II listed building (indirectly and through changes to its setting); as well as the nature, magnitude and timing/duration of any impacts on it; will be considered and appropriately assessed below in **Section 5**.

Other Listed Buildings within 3km

- 4.126 The remaining two Grade II* and 16 Grade II listed buildings within the 3km study area are civic buildings and transport features. In terms of their setting, they derive significance from their immediate streetscapes and group value within the settlements of Port Talbot to the north and Margam to the south-east. As such, they are not considered to have historic or functional connections with the distant parcel off formerly industrial and now brownfield land that forms the site.
- 4.127 As noted previously, any very limited glimpsed views of the tallest parts of the proposed development would be very distant and in the context of the current industrial backdrop. As a result, none of the assets is considered sensitive to the proposed development within the site and none is likely to be harmed by the proposals. A full list of these assets can be found in **Appendix EDP 3**.

Registered Parks and Gardens

- 4.128 There is just one RPG within the 3km study area. This is the Grade II Talbot Memorial Park located c. 700m north-east of the site. The listed buildings within the park are discussed in detail above.
- 4.129 The Talbot Memorial Park is a small urban public park situated on the east side of the A48, towards the southern end of Port Talbot, within the settlement of Taibach. The park is located opposite the steel works.
- 4.130 The history of the park is detailed within the Cadw citation document as follows:
- “On 3 September 1925 the Trustees of the Margam Estate gave the land for the park to the Port Talbot Borough Council as a memorial to Emily Charlotte Talbot, of Margam Castle, who died on 21 September 1918. The area, a field called Cae’r bont a’r sgunor, was at first laid out as a simple open space with a central war memorial to the dead of the First World War. The park was then laid out in its present form, at a cost of £13,000, and opened to the public on 26th June 1926.”*
- 4.131 The citation goes on to describe that the park is defined predominantly by the layout of its architectural features (the listed buildings discussed above), notably the elaborate entrance to the park marked by the gothic gateway, as well as the War Memorial Statue, memorial fountain and bandstand which are designed to be viewed and taken in by the central walkway through the park.
- 4.132 Beyond the architectural structures, the park is defined by open green space as well as substantial planting of specimen trees such as sycamore, monkey puzzle, birch, holly, variegated golden holly, evergreen oak, beech sp. (*Fagus sp.*) and flowering cherry, as well as vegetated boundaries of elder hedges.
- 4.133 The park is well bounded on all sides by vegetation, with further open and green space to the north and west comprising playing fields and the courtyards of St Theodore’s Church. As previously discussed, this setting allows the park to be experienced as a peaceful and secluded green area within an otherwise urban centre, allowing the memorial features to be best understood and appreciated.

- 4.134 Beyond this, in all directions, the wider setting of the RPG is defined by the residential and civic built form of Taibach. This setting contributes to the significance of the park in so much as it allows an understanding of the communal function of the park, providing a place of Memorial for the local community.
- 4.135 No historical or functional relationships between the RPG and the formerly industrial parcel of land forming the site have been identified. Furthermore, it is noted that views out from the park are primarily defined by the archway of the gothic gateway. Any views beyond this are screened by the row of houses immediately south-west of the church, as well as Duffryn Chapel. Given the lack of any visual or historical connection, the land within the site is not considered to form any part of the asset's setting that contributes to its significance.
- 4.136 It may be possible to obtain glimpsed views of high points of the development within the site from the RPG, such as storage tanks and processing plant. These views would be seen in the context of the already tall chimneys of the large Tata Steel Industrial Plant, which are visible in glimpsed views beyond the park gates. As such, any visual experience of the proposed development would simply result in glimpsed views of additional buildings within the current backdrop of industrial development.
- 4.137 At this stage, it is therefore assessed that development within the site would result in a very minor change to the setting of the Talbot Memorial Park RPG through glimpsed views of the high points of this new development. However, it is assessed that these limited partial views would be in the context of the already industrial setting. These very minor changes can therefore be considered to have no effect upon the already industrial wider setting of the asset and would not negatively impact upon its significance.

Scheduled Monuments

- 4.138 There are two scheduled monument located within the 3km study area, as clearly shown on **Plans EDP 1 and 2**. These are Ergyd Isaf Round Barrows (**GM160**), located c.2.3km east of the site, and Chain Home Low Radar Station, Margam (**GM488**), located c.2.7km south-east of the site.
- 4.139 Monument GM160 comprises the remains of two burial cairns, probably dating to the Bronze Age; these monuments form a wider cluster of prehistoric funerary features located further east and south-east on Margam Mountain. Hence, the core setting of the cairns is focused on this group of features on the high points of the mountain to the east.
- 4.140 Given the lack of any known or recorded prehistoric archaeology within the site or in its immediate vicinity (discussed in the Non-Designated Heritage Assets section below), the site is not identified to have any historic connection with the monument.
- 4.141 While the ZTV (**Plan EDP 1**) indicates there may be views from this high point down across the site, it is noted that any such views would be in the context of the current industrial backdrop and are not key to the setting of the monument, which is focused to the east.
- 4.142 This asset is not considered to be sensitive to the proposed development of the site, would not be adversely affected by it and is not discussed further.

- 4.143 Monument GM488 comprises the remains of a radar site that dates to the Second World War. No similar WWII defences have been recorded within the site, and so the site is not identified to have any historic connection with the monument.
- 4.144 Although the monument is located on the edge of the ZTV (**Plan EDP 1**), it is noted that the radar site is surrounded by woodland to the west and north, as such, it is unlikely that any views would be achieved in the direction of the site. Should any glimpses of the highest points of development be visible, these would be in the context of glimpses of existing high towers within the industrial backdrop of Port Talbot anyway.
- 4.145 Given the lack of visual or historic connection between the site and the monument, this asset is not considered to be sensitive to the proposed development of the site and is not discussed further.

NON-DESIGNATED HERITAGE ASSETS

Landscape of Special Historic Interest

- 4.146 The 3km search area around the site contains the Margam Mountain Landscape of Special Historic Interest (MMLSHI).
- 4.147 The GGAT has further defined it into Historic Landscape Character Areas (HLCA), assessing the importance of each (see **Plan EDP 6**).

Table EDP 4.1: Overview of HLCA within the Study Area

HLCA No.	HLCA Name	Distance from Site	General Character	Contribution of Site to Setting
002	Cefn Crugwyllt and Cwm Maelwg	2.4km east	<p>Characterised as an enclosed agricultural landscape with medieval/post-medieval settlement with fields and varied enclosures.</p> <p>Fields defined by distinctive boundaries including drystone wall, stone-faced banks and stone-faced banks with hedges.</p> <p>Documentary evidence suggests that the area, located on a localised high point, was formerly part of a medieval monastic grange belonging to the adjacent Cistercian Abbey of Margam.</p> <p>A prominent surviving feature of this monastic association is the 'Bath House' or 'Bath' Holy Well (PRNs 00754w and 04796w; SAM Gm 545) which dates to the 14th or 15th century.</p>	<p>No historic or functional associations have been identified between the agricultural landscape of HLCA002 and the industrial brownfield parcel of land which forms the site. During the medieval and post-medieval periods, the site was likely marginal, marshy land used for activities such as salt harvesting. As such it is not associated with the enclosure systems of the HLCA.</p> <p>No historic or functional associations have been identified between the medieval monastic features within HLCA002, given that the site would likely have been marginal marshy land during this period.</p> <p>Whilst the extent of HLCA002 was not assessed during the site visit in July 2022, it is noted that the ZTV illustrates that only a small portion of the area at the south-west would have a visual association with the site. Any views from this position would take in the site as part of the wider backdrop of industrial development around Port Talbot Docks.</p>
003	Cwm Brombil and Graig Fawr	700m east	<p>Area defined by the landform of the area, comprising the steep lower slopes of Mynydd Margam overlooking the coastal zone with deeply entrenched side valleys.</p> <p>Area characterised by Ancient and other broadleaved woodland.</p> <p>Earlier prehistoric military/defensive feature(s); such as the Iron Age Halfmoon Camp (PRN 0745w; SAM Gm 477, NPRN 54,457) of date.</p>	<p>No historic or functional associations have been identified between the agricultural landscape of HLCA003 and the industrial brownfield parcel of land which forms the site. During the medieval and post-medieval periods, the site was likely marginal, marshy land used for activities such as salt harvesting, before becoming used for industrial purposes. It is not associated with the enclosure systems of the HLCA.</p>

HLCA No.	HLCA Name	Distance from Site	General Character	Contribution of Site to Setting
			<p>Area formerly part of the monastic grange land associated with Margam during the medieval period.</p> <p>Area also characterised by a post-medieval agricultural landscape, especially to the north. This is defined by large enclosures, developed within formerly unenclosed areas, put in place by the early 19th century. These enclosures are centred on an evolved irregular fieldscape of small fields with distinctive field boundaries, of possible of medieval or earlier origin. Medieval pillow mounds (NPRN 54,461) and a group of medieval house platforms (NPRN 54,458 and NPRN 54,459) reflect the agricultural practices during this period. Only the vernacular buildings of Brombil Farm (PRN 1731w) remain as part of the post-medieval agricultural settlement.</p> <p>The area also includes a number of post-medieval industrial archaeological remains, namely the coal levels/shaft and colliery tramway all at Brombil.</p> <p>Modern additions to the character of the area include defensive features associated with World War II, the Home Chain Low radar station (PRN 02995w; SAM Gm 488).</p>	<p>In this regard, there is also no historical or functional relationship with either the prehistoric defensive features, medieval monastic features, nor the modern WW2 features.</p> <p>There is a limited historic/functional relationship with the site when considering the coal works at Brombil, as the site was utilised for industrial practices from the 19th Century onwards, as indicated through historic mapping sources. However, the development of the site would simply allow an appreciation of the continued industrialisation of the Port Talbot area.</p> <p>In terms of visual association between HLCA 003 and the site, the ZTV illustrates that large portions of the area would have a visual association with the site. This was confirmed during the site visit given the HLCA's location on high ground. However, the views from this position took in the site as part of the wider backdrop which is overwhelmingly defined by the industrial development around Port Talbot Docks (Image EDP 33).</p>
004	Mynydd Brombil a Eryd Isaf	c.1.2m to the east	Area 41 characterized by topographical location as upland/mountain.	No historic or functional associations have been identified between the medieval to modern agricultural landscape of HLCA004 and the industrial brownfield parcel of land which forms the site. During the medieval and post-medieval periods, the site was likely marginal, marshy land used for activities such

HLCA No.	HLCA Name	Distance from Site	General Character	Contribution of Site to Setting
			<p>Area saw progressive enclosure from at least the 18th century and now 42 characterized by medium and large regular enclosures, mostly of twentieth century date.</p> <p>Deserted medieval/post-medieval upland settlement associated with this landscape include pillow mounds and medieval platform houses; these include a group of up to 8 house platforms (NPRN 300,892), two enclosures and a group of between 3 and 5 ditched pillow mounds.</p> <p>The area also has evidence of prehistoric funerary practices as seen by two Bronze Age Cairns (SAM Gm 160) at Ergyd Isaf, the highest point within the area.</p>	<p>as salt harvesting, before becoming used for industrial purposes. As such is not associated with the enclosure systems of the HLCA.</p> <p>In this regard there is also no historical or functional relationship with either the prehistoric funerary features, given the lack of similar features known within the site or its immediate vicinity.</p> <p>In terms of visual association between HLCA 004 and the site, the ZTV illustrates that only small portions of the area at the far west would have a visual association with the site, given that the centre of the HLCA represents a high ridge point. Any views from the eastern edge of the HLCA were thus screened by the ridge, as confirmed during the site visit (Image EDP 34).</p> <p>The western edge of the HLCA is not publicly accessible, however it is likely that any views from this point would take in the site as part of the wider backdrop which is overwhelmingly defined by the industrial development around Port Talbot Docks.</p>
009	Cwm Dyffryn and Cwm Farteg Railway Corridor	c.1.1km east	<p>Area predominantly characterised as a communications route, encompassing the route of the now disused line of the Port Talbot Railway (PTR) built in c. 1898 and the route of the earlier Goetre Level Tramroad towards Margam Copper Works, as seen on the 1885 edition OS map.</p> <p>Area also characterised by early 20th century industrial railside settlements at and at Bryn where the earlier 19th century industrial settlement associated with the Bryn Colliery and Tramway was eventually expanded</p>	<p>The site has a very limited historic/functional relationship with HLCA 009 in so much as was utilised for industrial transport and industrial practices from the 19th Century onwards, as indicated through the presence of a number of tramway routes, and the immediately adjacent route of the Port Talbot Railway in late 19th to early 20th century mapping. However, the site does not have a direct connection to these routes, which led to the Margam Copper Works to the east of site. As such, the development of the site would simply allow an appreciation of the continued industrialisation of the Port Talbot area and thus be in keeping with this historic connection.</p>

HLCA No.	HLCA Name	Distance from Site	General Character	Contribution of Site to Setting
			<p>around the later railway station. The settlement is characterised by linear ribbon and grid street layouts.</p> <p>Another significant visual feature at Goetre is its large cemetery, constructed in 1915.</p> <p>The area also contains industrial remains dating to the 19th century, such as the disused Goetre Level coal mine, as seen on the 1885 edition OS map.</p>	<p>There is no visual relationship between the site and this character area due to the intervening-built form, as well as the varied topography which dramatically rises towards the eastern extent of the area (Image EDP 35).</p>
010	Mynydd Margam	c.2.3km east	<p>The area is chiefly characterised by extensive 20th century forestry plantation, although it also comprises tracts of Ancient Woodland, notably within the valleys including Cwm Maelog (partly replanted with conifers in 1858), Nant Cwm-y-Garn, and Cwm Nant-y-Glo, with further broadleaved woodland within Nant Cwm Wernderi.</p> <p>The area is part of the extensive monastic lands associated with Margam Abbey and farmed from granges at Hafod (Hafod-y-Porth) and Cryke. It was formerly marginal land as open mountain, with areas of grazing/grouse moor.</p> <p>The area is therefore a mixture of formerly unenclosed and evolved/irregular and varied enclosure. Along with these post-medieval field systems is evidence of post-medieval settlement, including a loose dispersed scatter of farmhouses and cottages, including Blaen-Maelwg, Llan Ton-y-Groes, and Nant-y-Glo farmsteads, and farm</p>	<p>No historic or functional associations have been identified between the medieval to modern agricultural landscape of HLCA004 and the industrial brownfield parcel of land which forms the site. During the medieval and post-medieval periods, the site was likely marginal, marshy land used for activities such as salt harvesting, before becoming used for industrial purposes. As such is not associated with the enclosure systems of the HLCA.</p> <p>In this regard there is also no historical or functional relationship with either the prehistoric funerary and defensive features, or the prehistoric communication corridor, given the lack of similar features known within the site or its immediate vicinity.</p> <p>While the extent of the HLCA was not visited during the site visit in July 2022, only a very small portion of the western edge of the HLCA is within the 3km study area, moreover, only limited parts of this are indicated by the ZTV as having a visual connection with the site, due to the rise in topography to its immediate west. As such, any views from these limited, localised points take in the</p>

HLCA No.	HLCA Name	Distance from Site	General Character	Contribution of Site to Setting
			<p>buildings at Wernderi and Hafod, which likely have medieval precursors.</p> <p>The area is also important for its prehistoric funerary and ritual, and prehistoric military features, including Bronze Age cairns as at Ergyd Uchaf (SAM Gm 159), Cwm Cynffig, (SAM Gm 443) and Twmpath Diwlith (PRN 00754w), as well as an oval enclosure known as the 'Danish Camp' (SAM Gm 056). The area is also significant as an early communication corridor, based on prehistoric ridgeway routes, the most important of which is Ffordd-y-gyfraith, which runs along the ridge of Mynydd Margam.</p>	<p>site as part of the wider backdrop which is overwhelmingly defined by the industrial development around Port Talbot Docks.</p>
017	Cwm Dyffryn	c.800m east	<p>The area comprises the southern valley sides of Margam mountain and is characterised by an agricultural landscape of post-medieval enclosure with a varied field pattern, dominated by evolved/irregular and small regular fields. These enclosures comprise distinctive and varied field boundaries, including stone-faced banks, hedges, earth banks and post and wire fencing. Evidence of post-medieval settlement remains as loosely dispersed and minor ribbon development of farms and cottages along the industrial urban fringe.</p>	<p>No historic or functional associations have been identified between the medieval to modern agricultural landscape of HLCA004 and the industrial brownfield which forms the site. During the post-medieval period, the site was likely marginal, marshy land used for activities such as salt harvesting, before becoming used for industrial purposes. As such is not associated with the enclosure systems of the HLCA.</p> <p>There was no visual relationship between the site and the publicly accessible portion of this character area due to the varied topography which dramatically rises towards the eastern extent of the area, screening any views beyond this (Image EDP 36).</p> <p>While there may be limited, localised views from other areas at the western edge of the HLCA, as indicated by the ZTV, such views would simply take in the site as part of the wider backdrop which</p>

HLCA No.	HLCA Name	Distance from Site	General Character	Contribution of Site to Setting
				is overwhelmingly defined by the industrial development around Port Talbot Docks.

- 4.148 The closest point of the MMLSHI is c.700m to the east of the site. As such, any effects from the proposed development will be indirect as a result of changes to the setting of the landscape. The following section thus summarises the defining features of those Historic Landscape Character Areas (HLCA) located within a 3km search radius of the site and considers any potential indirect effects to their historic interest as a result of development within the site. This information is summarized in **Table EDP 4.1** (see above).
- 4.149 During the site visit, it was concluded that the site does not feature in any key or significant views from any of the HLCAs within the search area. In most cases, any outward views are entirely screened or closed off by the intervening-built form and vegetated environment, as well as the varied local topography, where the ridge of the mountain serves to curtail views from the most eastern HLCAs.
- 4.150 Where views are available; notably from HLCA 003 which offers the best visual experience of the site, it was noted that they are already overwhelmingly defined by the current industrial backdrop of the development around Port Talbot docks.
- 4.151 With regard to any historic or functional relationships between the site and the HLCAs within the search areas, these are principally defined by medieval and post- medieval agriculture. Given that the site would likely have been marginal land, with limited management such as for salt production, it has no appreciable historic or functional connection with the enclosure systems of Margam Mountain. The HLCAs also comprise clusters of prehistoric activity, predominantly to the east in HLCA 003, 004 and 010. No evidence of activity from this period is known or anticipated within the site, and so no historic connections have been identified in this regard.
- 4.152 There may be some very limited historic and functional inter-relationships with the industrial archaeology and history of the Margam Mountain Landscape, notably Brombil Colliery in HLCA 003 and the rail and tramway network within HLCA 009, given the site's industrial function during the 19th and 20th Centuries with tram routes located within the site and its immediate proximity to the Port Talbot Railway and the docks. However, there is no direct connection with these features because the site was not developed in association with the Brombil Colliery itself, nor the Margam Copper works which the tramway route of HLCA009 was designed to serve. As such, this very minor historic association merely reflects the wider industrialisation of Port Talbot during this time, and the industrial development of the site would not detract from an understanding of this industrial history in any way.
- 4.153 In light of the above, the potential for the proposed development to impact upon the Special Historic Landscape (indirectly and through changes to its setting); as well as the nature, magnitude and timing/duration of any impacts on it; will be considered and appropriately assessed below in **Section 5**.

Non-designated Archaeology

Palaeolithic - Iron Age (c.1,000,000 BC-AD 43)

- 4.154 There are no non-designated heritage assets dating from the prehistoric periods recorded on the HER within the site boundary, or within the search area of up to 1km. A single record is noted by the NMRW within the search area of up to 1km.

- 4.155 This record is located c.350m west of the site and within the Port Talbot Docks (**524727**). During the expansion of Port Talbot docks in the 1890s, deep stratigraphies were revealed during the excavations. This stratigraphy was reviewed by the BGS and peat deposits were identified in this location (Bell, 2007). The NMRW refers to the site as a submerged forest and infers a Mesolithic date, but it does not provide any further information. Although this potential forest may have provided a ground surface, there is no evidence to suggest it was inhabited, but may simply have provided a location for hunter gatherer activity.
- 4.156 There is limited prehistoric activity attested within the wider landscape, the closest of which comprises the two scheduled monuments located c.3km to the east of the site, within the Margam Mountain Landscape of Special Historic Interest.
- 4.157 These monuments are the Ergyd Isaf Round Barrows (**GM160**), comprising two Bronze Age burial cairns and Ergyd Uchaf Round Barrow (**GM159**). These assets indicate prehistoric ritual and funerary practices within the region.
- 4.158 The site is located immediately east of the Bristol Channel. Given the low-lying nature of the site, it is likely this area would have been marginal silty land, as indicated by the geological deposits of tidal flats. These conditions would therefore not likely be suitable for settlement or funerary practices, and such activity would more likely be concentrated on the higher ground to the east such as Margam Mountain, as seen by the presence of scheduled round barrows.
- 4.159 However, these tidal zones, likely formed of salt marshes, could have been a suitable location for limited land management, such as for the production of salt. Furthermore, it is noted that during the prehistoric period, the current water level of the River Avon would have been lower, and so the foreshore would have been further out. Whilst the site would likely have still been marginal land, this lower water level means the land may have still been suitable for vegetation growth and animal life.
- 4.160 A number of ground investigations have been undertaken as part of the application, including several test pits, bore holes and sample holes, excavated across the main parcel of site. The test pits were excavated between 0.5m and 2.5m in depth, and revealed only evidence of made ground, which relates to the modern industrial use of the site.
- 4.161 The boreholes undertaken across the site have revealed a similar formation, comprising made ground relating to modern industrial use up to 2.5m in depth, but underlying this are several layers of sandy, silty clay, occasionally with pockets of amorphous peat up to c.12m in depth. Below this a layer of peat deposit is recorded, spanning the majority of the site (although absent from a few borehole records); this deposit is encountered at a depth of between 12m to 14m below existing, and generally spans c.1 to 2m in thickness.
- 4.162 It is described as “soft brown to dark brown slightly clayey fibrous amorphous peat” and, where they are present, the deposits have the potential to contain paleoenvironmental evidence or evidence for prehistoric activity.
- 4.163 It is noted that the prehistoric reflects a broad period with different activities undertaken at different times; given the nature of the land on the foreshore it seems likely that this land could have provided opportunities for seasonal hunter gathering during the Mesolithic

period, with a progression to limited land management such as agricultural cultivation or salt production.

- 4.164 These activities would thus result in a varied archaeological record but most likely result in uncontextualised find spots related to hunter gathering, or limited land management features such as ditches and pits which are unlikely to be of greater than moderate archaeological interest or significance.
- 4.165 Moreover, the available test pitting and borehole evidence supports the view that any significant prehistoric archaeological features or deposits which may be present within the site will be deeply buried beneath accumulations of alluvial clay and modern made ground, such that they are unlikely to be encountered in anything but the very deepest excavations associated with proposed development.
- 4.166 Therefore, for the most part, it is assessed that there is no more than a **low** potential for significant archaeological features or remains of prehistoric date to be identified, exposed or impacted proposed development.

Roman (AD43–410)

- 4.167 There are no non-designated heritage assets dating from the Roman period recorded by the HER within the site boundary. There are just two records within the search area of up to 1km recorded by the HER as dating to the Romano British period.
- 4.168 The first record comprises the route of a Roman road which runs north-west to south-east, as part of the Cardiff to Neath Road **RR60c**, along the route of the current A48. The closest point of the road is located c.700m east of the site.
- 4.169 The second record relates to a milestone indicating the presence of another Roman road, located c.625m to the north-west of the site (**GGAT00732w**). The HER notes that this road is considered to follow the inner edge of the Port Talbot to Aberavon coastal plain. This is also recorded as NMRW record (**307252**).
- 4.170 Whilst these HER records do indicate movement in the wider landscape during the Romano British period, there is no evidence for permanent activity within the site. This lack of known activity is once again likely to be the result of the site's location on the marginal, silty land within the coastal tidal flats, which would have made it unsuitable for settlement.
- 4.171 However, the salt marsh formation of this land would have been a suitable location for the harvesting of salt, and so Roman activity in this area would most likely have been related to these sorts of industrial practices. However, it is noted that this process would have been undertaken at localised points sporadically along the coastline, and so hence there is only a limited chance of encountering such activity at the site.
- 4.172 Although the possibility of encountering features or deposits dating to this period cannot be entirely ruled out in view of the evidence of movement across the surrounding landscape; the paucity of known records within the vicinity, and the nature of the site located within the tidal flood zone, indicates only a **low** potential for significant archaeological remains.

4.173 Any such remains would be unlikely to relate to high value features such as high-status domestic settlement or military practices which are seen elsewhere in South Wales. Instead, it is most likely that any remains would be low value features and deposits related to limited land management and agricultural practices related to pastoral grazing or salt works, such as drainage features.

4.174 Moreover, it is noted that the previous development of site for modern, industrial purposes is very likely to have damaged or entirely destroyed any currently unknown buried deposits within its boundaries.

Early Medieval (AD 410–1066)

4.175 There are no early medieval records within the HER data identified within the site. However, there are four records dated to this period within the search radius 1km.

4.176 These records are all located to the north-east of the site; approximately 675m from the site the HER records an early Christian monument consisting of a cross-carved stone slab dating to the 7th-9th century, which was later recut in the late 10th-11th century into a low relief ringed cross on the opposite side (**GGAT00728w**).

4.177 Further to the north, situated approximately 800m from the site, records (**GGAT00726w**), (**GGAT00727w**) and (**GGAT00724w**) comprise a cross slab, cross and pillar stone at Upper and Lower Court Farm respectively. The cross-slab dates to later 9th or early 10th century and comprises a carved cross and partial Latin inscription. The cross comprises part of a disc-headed cross with decoration on both main faces and the surviving narrow side. Although the cross is not definitely dated, it is described by the HER as pre-Norman, with the Royal Commission on the Ancient Historic Monuments of Wales (RCAHMW) suggesting an 11th century date. Both features were found during the demolition of a building called Hen Gapel, the site of a medieval chapel at Upper Court Farm.

4.178 The pillar stone is cylindrical in shape, with crosses on three sides; it also contains an inscription reading TOME, possibly relating to the name of the person commemorated, or indicating a dedication of the site to St Thomas. The HER states that the two larger, outline crosses and the inscription are suggested to date to the 8th-9th century, although the third, linear cross might be earlier.

4.179 While these records suggest settlement to the north of site during the early medieval period, it is likely that the site remained as relatively marginal land during this period, with limited agricultural management, such as pastoral grazing or salt production, due to its location on the tidal flats. The focus of settlement at this time was likely located further inland to the east around Margam, where an early medieval ecclesiastical site is inferred from a group of decorated and inscribed stones dating to the 9th-10th centuries found in the immediate vicinity of the later Cistercian Abbey (GGAT, Mynydd Margam Historical Processes, Themes and Background (ggat.org.uk)).

4.180 The lack of known records within the vicinity of the site shows that there is a **very low** potential for significant early medieval archaeology within the site, with the evidence indicating that remains of this period (if they are encountered) are more likely to focus on agricultural exploitation and management of the rural landscape and comprise boundary

features and ploughsoils of relatively low interest or significance. It is also likely that any evidence for activity in this period will have been adversely affected by the site's industrial development (through truncation etc) and this will have further reduced its significance.

Medieval (AD 1066 - 1485)

- 4.181 There are no medieval records within the HER data identified within the site. However, there are three records dated to this period within the search radius of up to 1km from the boundary of the site.
- 4.182 These records are all located to the north of the site in a grouping around 840m from the site boundary. This cluster of records all relate to the medieval chapel of Hen Gapel. The chapel itself is recorded as (**GGAT05277w**). It is described by the GGAT HER as the possible chapel of Margam's Meles Grange. The building has since been converted into a cottage, but remaining architectural features include Sutton stone dressings, including to the doorway, which has a semi-circular head. Immediately to the north of this is Meles Grange (**GGAT00725w**); the grange belonged to Margam Abbey as detailed in documentary evidence dated to 1186. The grange is currently represented by sites of Upper Court and Lower Court farms. The grange does not appear in the documentary sources after 1350, although the HER notes that it is possibly the same as the Llanfugeilydd Grange which is recorded from the beginning of the 16th century.
- 4.183 Located slightly to the west of these two records is Lower Court Farmhouse (Yr Hen Gapel) (**GGAT01159w**). This house pertained to the Abbey lands of Meles (Meles Granges). It was destroyed in 1913 but prior to this was used as a chapel, first licensed by Bishop Elias in 1239, before being converted into a cottage. The building is recorded as having been a two-storeyed house with a single gable-ended chimney and putlog holes in the gable wall.
- 4.184 While these records indicate settlement to the north of site during the medieval period, it is likely that the site remained as relatively marginal land during this period, with limited agricultural management, such as pastoral grazing and salt production, due to its location on the tidal flats. The focus of settlement at this time was likely located further inland to the east around Margam, where the Cistercian Abbey formed a focal point for the expansion of the community.
- 4.185 The lack of records within the vicinity of the site thus shows a **low** potential for significant medieval archaeology within the site, with the evidence indicating that remains of this period (if they are encountered) are more likely to focus on agricultural exploitation and management of the rural landscape and comprise boundary features and ploughsoils of relatively low interest or significance. It is also likely that any evidence for activity will have been adversely affected by the site's industrial development (through truncation etc) and therefore this will have further reduced its interest or significance.

Post Medieval to Modern (AD 1485– present)

- 4.186 The HER does not identify any archaeological record from the post-medieval to modern periods within the site, although a number are located within the wider study area.
- 4.187 The closest of these is located c.50m north of the northern parcel within the site. This record is related to a Jetty (**08808w**) forming part of the old docks, the dock itself is recorded by

the NMRW as **913949**, discussed further below. The jetty is first depicted on the 2nd edition OS map of 1899, where it is shown as a SW-NE aligned jetty, cross-shaped, approached by a disused tramway. The docks were subsequently remodelled, as shown on the 3rd edition OS map of 1919, and the jetty is shown to have been replaced by a new linear Jetty, associated with the Rio Tinto Copper Works, set parallel to the dock edge. This layout remains the same of the 4th edition map of 1940, but with two mooring posts and five mooring rings indicated. This arrangement is shown on subsequent maps.

- 4.188 Remains of this later feature were seen during the site visit as a disused, dilapidated wharf running parallel to the docks. No evidence was seen for the earlier, 19th Century jetty, and instead the remains are assessed as being early 20th Century in origin, and even then with a number of later repairs and alterations. The later wharf is therefore considered to be of negligible heritage value and any impacts upon it as a result of the proposed development are discussed in **Section 5** of this report.
- 4.189 There are 56 records dating to this period within the wider search area. There are also 40 records identified by the NMRW within the 1km search area. These records are predominantly associated with the rise in industrial activity across the landscape during the late 18th to 20th Centuries.
- 4.190 To the north of the site, approximately 150m from its boundary, six records are recorded by the HER located within the docks of Port Talbot. The dock itself is recorded by the NMRW as record **913949**. The docks were built in 1839 to serve the iron and copper industries of Cwmavon, but by 1890 it was almost obsolete and needed revival as an outlet for coal from the western central valleys, as illustrated by its considerable redevelopment at this time. The HER records within the docks each relate to a jetty of either the old or new docks.
- 4.191 Records **GGAT08809w**, **GGAT08806w** and **GGAT08807w** each relate to a jetty forming part of the old docks; the features are depicted on the 2nd edition OS map of 1899, but they are then shown as having been removed during the major remodelling of the docks and are no longer visible on the 3rd edition OS map of 1919.
- 4.192 Entries **GGAT08802w**, **GGAT08804w**, **GGAT08803w** and **GGAT08805w** identify jetties in the new docks. Again, each jetty is visible on the 2nd edition OS map of 1899 as part of the new dock, but they were removed by the expansion of the Dock indicated by the 3rd edition OS map of 1919.
- 4.193 Two modern wreck sites are also noted by the NMRW within the docks, but they have no relevance to the archaeological interest of the site (**506806** and **515495**).
- 4.194 A number of additional features related to the Old and New Docks are also located at the water's edge of the docks, the closest being c.60m north of the site. **GGAT08813w**, a landing stage at Llewelyn's Quay, **GGAT08819w**, Llewelyn's Quay itself, **GGAT08818w**, new wharf at the old docks, **GGAT08832w** a slipway at the harbour house, **GGAT08812w**, Talbot Wharf, Old Dock, **GGAT08818w**, New Wharf, Old Dock, **GGAT08814w**, Goods Wharf, North Bank and **GGAT08841w** locks between New Dock and Old Dock. These features are all initially shown on the late 19th Century OS mapping, before gradually being removed or replaced with modernised features during the mid-20th Century.

- 4.195 Further to the western end of the docks, a minimum of 400m from the site, are additional features relating to industrial processes. They include NMRW record **41415**, Port Talbot Docks Railway Station; the station was opened in 1891 but closed just four years later in 1895. The HER records include **GGAT08820w**, a wharf at Old Dock, **GGAT08833w**, Graving Dock North West of New Dock and **GGAT03124w**, **GGAT08800w** and **GGAT08801w**, a lock and two jetties leading to New Dock.
- 4.196 These features are again first illustrated on late 19th century mapping, and the lock and jetties to new dock remain extant today. The industrialisation of this area also gave rise to an increasing population, and so residential housing for dock workers is noted as Wharf House (**GGAT08612w**) as well as at Wharf Row (**GGAT08613w**). A public house known as Pilot's Rest Inn is also recorded (**GGAT03125w**). These buildings are first illustrated on the 1st edition 1:2500 OS map of 1876, but they are no longer extant.
- 4.197 Approximately 900m north-west of the site, and at the location of the Grade II listed Plate Girder Bridge (**GGAT05818w**), entry **GGAT05817w** relates to an earlier bridge in this location. The bridge comprises the remains of two parallel lines of timber posts crossing the River Avon immediately north of plate girder bridge, shown as railway bridge on the OS third edition map of 1917. To the south-west and approximately 875m from the site, GGAT HER record **GGAT09021w/NMRW411536** relates to a coastal artillery battery used as a defensive position during the Second World War. Further south, c. 300m from the site, an earlier rifle range is recorded (**GGAT03126w**). This range is visible on the 1878 edition OS map, although removed by the 1899 edition, and relates to the Volunteer Rifle Ranges set out in the sand-dunes at Briton Ferry and Margam in the 1870s.
- 4.198 To the east are the former sites of the Margam Copper Works (**GGAT08610w/NMRW34098**), located c.60m from the eastern parcel of the site, and Margam Iron and Steel Works (**GGAT08983w/NMRW408513**), located c.200m from the eastern parcel of the site. The site of Margam Copper Works is shown on the 1st ed. 1:2500 OS map of 1876-77. The works are first illustrated on the 1st edition 1:2500 OS map of 1876-77, comprising a core works complex with outlying Coke Ovens to the north and Limekilns to the north-west.
- 4.199 Although it is not individually recorded by the HER, a wharf with associated jetties/landing stages is seen to the west, where it is served by an extensive internal tramroad/rail network which spans the eastern parcel of the site. These industrial remains are discussed further in the **Historic Mapping** and **Site Visit** sections below. Associated waste tips are also visible to the south-east.
- 4.200 By 1899 the site was largely disused, and by the early 20th Century the site was taken over by the development of the far larger Margam Iron and Steel Works. The steel works were built in 1926 and are depicted on the 4th edition 1:2500 OS map as an extensive complex of linear buildings served by an internal rail system. The rail system joined the lines of the GWR Port Talbot Docks Branch at the Copper Works junction to the south, further lines then extended to the north-west to various works including Port Talbot Steel Works, as well as the goods Wharf and North bank area of the Old Dock at Port Talbot. The map also identifies various features at the works including its numerous chimneys, tanks, travelling cranes and a weighing machine. The works were closed in 1953 and the site cleared of built remains.

- 4.201 Approximately 650m to the south-east of site, NMRW records **19360** and **9867** relate to a domestic building - Morfa Mawr Farmhouse - and Trinity chapel respectively. No further details are recorded and both buildings have been cleared as part of the Tata Steel Works.
- 4.202 Located further to the east, within the settlement on Taibach and Port Talbot, are numerous additional records held by the HER and NMRW, illustrating the expansion of the settlement during this period of industrialisation. These records relate to domestic, religious, and civic buildings, as would be expected of a growing settlement, and have no relevance to the archaeological potential of the site.
- 4.203 An assessment of the HER and NMRW records within the wider vicinity of the site illustrates the industrial nature of the local area and the expansion of settlement and infrastructure as a result of these activities.
- 4.204 Whilst it is not specifically recorded by the HER, the industrial development of the site in the 19th and 20th centuries is well documented (see the **Historic Mapping** section below). As such, whilst the site has been cleared of extant remains, there is a moderate to high potential for buried deposits relating to industrial development, but only a **low** potential for these deposits to be of archaeological significance.
- 4.205 Given their modern date and well understood development through analysis of the various cartographic sources, such features would be of no more than low local value, evidencing the industrial development and operation of Port Talbot.

HISTORIC MAPPING

- 4.206 The site is first depicted on the 1814 Margam Estate Map (**Plan EDP 7**). No tithe map is available for Margam Parish due to the area having been mapped in this earlier private estate survey.
- 4.207 The 1814 map shows the main parcel of the site (PDZ) to be located within and to the west of the River Avon's original route, with the eastern edge located within its many tributaries. The site is thus seen to have been composed of the river itself, its small tributaries and associated marginal land located within a wider area which is recorded on the map as comprising "salt marshes" (**Field 11**).
- 4.208 Within the eastern parcel of the site, one of the river tributaries appears to have been canalised and runs north-east towards Ton-y-Groes Farm and Dyffryn. Similarly, a small channel is illustrated within the western parcel of the site, connecting one of the western tributaries to the main body of the river to the north-west.
- 4.209 This map thus supports the assessment that, prior to industrial development during the late 19th Century, the site was most likely marginal land within the river flood zone, used for limited production, such as for salt, although with some limited intervention to provide waterways, likely for transport of goods, to the north-east and north-west.
- 4.210 Further to the west, and outside of the site boundary, the map indicates a single area (Field 12) used as a sheep walk, and beyond this the area is noted as sand dunes. It is therefore evident that settlement was focused to the east of the river during the early 19th

Century and, given the topography of the land as marshy or intertidal sands, this was likely also the case prior to this period. Either way, there is no evidence or indication from the 1814 map for the presence of significant human activity within the site, beyond the canalisation of the river tributary leading to the north-east and a small channel leading to the north-west, likely for the transport of goods.

- 4.211 The next map to illustrate the site is the 1876 1:2500 1st edition OS map (**Plan EDP 8**). The western portion is depicted as a mixture of marshland and mud. The map suggests that the curving channel passing north-south through the western parcel of the site was truncated and cut short in the middle of the 19th century, stopping at the Port Talbot Inn and not connecting north into the river channel.
- 4.212 In addition, it is also evident that immediately north of the site was developed into the Port Talbot Docks, which were opened in 1839. A tramway route running east to west between the site and the water's edge is illustrated on the first edition OS map. The northern parcel of the site is shown to form the edge of the Old Docks, however no associated features are depicted in this edition map.
- 4.213 This map shows the eastern parcel of site to form part of the Old Docks, and forms several inlets within the water at the western edge of the docks. This parcel of site is shown to be largely marsh land, although a tramway is shown running north to south in the north-east corner of this parcel, serving the Margam Copper works immediately to the east. The seemingly canalised waterway depicted in the 1814 map remains illustrated, although it appears to have been infilled by the 1900 map for wider industrial development, as discussed below.
- 4.214 The 1900 edition OS map (**Plan EDP 8**) shows no significant change in either the east or north of the site, but there is significant change and development illustrated within the western parcel and evidently involving substantial land reclamation.
- 4.215 The Port Talbot railway line is shown running east to west immediately south of the main site area, with a number of tramway spurs spanning the western portion of the site and to the west the development of the docks is evident through numerous jetties and slipways. Also, to the north-west of the main parcel within the site, an engine house is marked adjacent to the water's edge. The features clearly indicate the rise of industrialism within Port Talbot during the late 19th Century.
- 4.216 By the 1921 edition OS map (**Plan EDP 8**), the main parcel of the site had been developed further for industrial purposes; the tramway spurs consolidated into one route comprising rail and tram lines entering the site from the south-west corner, leading to the built form of the Crown Preservation Coal Works at the northern end. The works comprised a central building, with three smaller ancillary buildings to the south, as well as three ancillary buildings to the north which lay outside the site boundary. The site also took in a small portion of the southern part of the Rio Tinto Copper Works, with the corner of the central building and two small ancillary buildings lying within the site boundary. The eastern edge of the main parcel (now Davies Crane Hire), however, remained as marginal marshy land.
- 4.217 The western parcel of the site included a number of railway trackways leading between various jetties and a spoil tip further to the south. No built form is recorded in this parcel.

Further industrial development is noted within the northern parcel of site, on the water's edge. The jetty, recorded by the HER, to the north-west of site in the 1900 edition had been demolished and a new wharf constructed on the southern and western edges of the docks. The wharf within the northern parcel (named 'Crown Wharf' on the 1965 OS map), remains present today, but this appears dilapidated and out of use.

- 4.218 This map also shows a reordering of the eastern parcel of site to allow for the construction of a new Port Talbot Dock Railway Line, which ran north-west to south-east, adjacent to the water's edge, and replaced the earlier tram line. This reordering included infilling of the inlet to the south. Further to the east, this map shows that the Margam Copper Works buildings focused to the south-east had been demolished, while the buildings to the east had expanded.
- 4.219 By the 1947 edition OS map (not reproduced), the Crown Preservation Coal Works had been cleared and replaced with the Metal Refinery Works, which comprised a long rectangular building running north to south across the site, with two ancillary buildings to its east. This refinery was still served by the tramway visible on the 1921 edition OS map. By contrast, the Rio Tinto Copper works remained unchanged.
- 4.220 While the eastern half of the site is no longer depicted as mud flats, it is noted that this area remained undeveloped by 1947. However, by the 1951 edition OS map (not reproduced), this eastern part of the main site (Davies Crane Hire) a single building is depicted, named 'Phoenix Briquetting works', alongside a tram route and spoil heap to the west, and further tram or rail routes to the east, connecting to the main line to the south.
- 4.221 This map also shows further reordering of the eastern parcel of the site to serve the expanding Margam Iron and Steel works. This shows a further infilling of the waterside inlets around the railway, forming a straight edge of the docks, parallel to the railway line. A number of mooring posts are recorded on the water's edge. The newly infilled land is then heavily developed with industrial buildings of the Iron and Steel Works, with a large warehouse building located immediately east of the site, and several tanks and storage buildings, as well as tramline spurs, located in the northern corner of the site.
- 4.222 The 1947 OS map also shows the construction of two buildings, likely industrial warehouse or storage buildings, in the western parcel of site. One of these buildings had been demolished by the 1965 edition OS map however, and the other appears to have been largely altered for expansion or rebuilt altogether. This building was further expanded or rebuilt in the late 20th and early 21st Century, but has since been demolished, although evidence of foundations were visible during the site visit in July 2023.
- 4.223 By the second half of the 20th Century, as shown on the 1965 OS map (**Plan EDP 8**), the Metal Refinery Works within the western parcel of the site had been expanded with additional warehouse buildings to the east, and an extension to the rail route to serve them. An area of disused scrubland is also illustrated to the west of the factory. The Rio Tinto buildings remained unchanged within the site, although they had undergone limited development to the north with a new building and additional rail lines. Also shown on this map is the development of the area to the east of the site, which is depicted to contain additional industrial buildings and associated rail routes, simply labelled as 'Works'.

- 4.224 To the east, the Briquetting works were expanded, with the former tram route and spoil heap replaced by a rectangular industrial building immediately to the north, and two additional small industrial buildings and a large cylindrical building immediately to the west (in the small area excluded from the Site boundary). The main works building appears to have been demolished and the site occupied by a number of smaller industrial buildings over the late 20th and early 21st century. However, the site visit indicated that the two industrial buildings and cylinder survive, although these lie outside of the Site boundary. As industrial buildings of mid-20th century date, which have likely undergone a number of alterations for modern purpose, these are not considered to be of heritage value and are not discussed further.
- 4.225 Within the eastern parcel of site, the Margam Iron and Steel Works had been reordered slightly, so that the storage tanks to the north had been removed, but replaced with alternative storage tanks, and the buildings immediately east of the site had been altered. The railway line running parallel to the docks was also removed, but replaced with an access road. Similarly, the tramway spurs to the north were cleared away completely.
- 4.226 The historic maps thus confirm the assessed data and observations made within this assessment that the site was marginal land within the tidal zone of the River Avon. The OS maps illustrate that the site contained industrial features including tram and rail routes, as well as factory buildings (of early to mid-20th century construction) up until their closure and clearance in the late 20th Century. They clearly show the development of the metal works surrounding Port Talbot Docks.
- 4.227 While no such features were visible during the site visit and appear to have been entirely cleared bar remaining hard standing (discussed in the Site Visit section), there is still some potential for below ground deposits, such as foundations, relating to these features to remain.
- 4.228 As evidenced by the historic mapping discussed above, any built remains are likely date to the early 20th century and onwards. In view of the clearance of the site in recent years, it is unlikely that any features survive as extant structures, however, beyond some limited areas of hard standing and demolished building materials, which were seen in the main parcel of site and eastern parcel of site during the site visit and are discussed in full below. It is more likely that any industrial features survive as buried deposits, such as building foundations, which have been largely disturbed by the demolition activities. Considering this likely limited and fragmentary survival, as well as the relatively recent date of these features, it is assessed that they are of no more than low or local interest, evidencing the wider industrial development of Port Talbot.

LIDAR DATA

- 4.229 Airborne LiDAR data (light detection and ranging) was utilised as a source of primary data for the current assessment. LiDAR scanning records height data and has applications in the recording of archaeological earthworks.
- 4.230 A Digital Terrain Model (DTM) for the site was acquired from the Environment Agency Data available on-line. Resolution of the data is at one data point for each 1m², a low resolution

which, for archaeological prospection, has fairly limited application, aside from in the identification of larger earthworks.

- 4.231 The DTM was processed using the Relief Visualisation Toolbox (ver. 1.3 ZRC SAZU, 2016). This software allows for a range of visualisation techniques to be applied to the data. Different techniques have varying degrees of successful application, depending on the nature of the environment where the data was collected. As such, the whole suite of visualisations was produced and then, the individual images appraised as to their usefulness in the current context. This appraisal identified that of the visualisation techniques *Multiple direction hill-shades* produced the best quality and most useful imagery for the archaeology assessment.
- 4.232 This technique was used to produce useful images for the assessment providing an additional source of data on the site's archaeological potential, and which was used for guiding the walkover survey.
- 4.233 The Lidar imagery clearly shows the hard standing on which the main north to south orientated building of the Metal Refinery Works was situated. This was clearly identifiable during the site visit and is discussed further below.
- 4.234 In the very south-west corner of the main parcel of site, very low relief curved features represent potential earthworks relating to the tram and rail system which served the industrial buildings. These features are not clearly defined and appear to have been largely cleared.
- 4.235 No evidence of the Crown Preservation Coal Works is discernible within the Lidar model. Elsewhere, sporadic evidence of tree canopies is visible, illustrating that the site has been abandoned and left to grow into disused scrub and woodland in the more recent decades.
- 4.236 Lidar data available for the eastern parcel of site shows the route of the access road, as well as cleared land to the east, following the demolition of the industrial buildings in this location. A sub-circular depression and earthwork is seen at the southern point of this parcel of the site; however no such feature was seen during the site visit, and it likely reflects tree growth or one of the many modern spoil heaps seen on site. No other features of archaeological potential were identified.
- 4.237 The western parcel of site is shown to have been cleared of any built form, with no discernible features beyond the existing hard standing.
- 4.238 The Lidar data thus confirms the previous observations (see above), showing that features of negligible heritage value relating to the Metal Refinery Works are present in the main parcel of site. Potential evidence of the tram and rail routes which served the industrial works may also remain on site, however such features would also be of negligible interest.

AERIAL PHOTOGRAPHS

- 4.239 A total of 23 vertical photographs, covering the application site and its immediate environs, were identified within the collection maintained by the CRAPW. None of the photographs are reproduced here due to copyright restrictions.

- 4.240 The available images span the period from December 1941 to 2002 and add detail to the land use and development sequence shown on those historic maps discussed above.
- 4.241 The photographs demonstrate that, in the mid-20th Century, the layout and boundaries at the site were much as shown on the comparable mid-20th century historic maps. The photos thus illustrate the growth of the Metal Refinery Works and Rio Tinto Copper Works in the main parcel of site, as well as the Margam Iron and Steel Works within the eastern parcel of site, from the 1940s through the later 20th Century, with the buildings depicted on historic mapping visible, as well as associated activities including railway lines, small transport roads, vehicles and storage units.
- 4.242 The photo from 1960 shows the Briquette works, alongside the cylindrical industrial building, which lies outside of the Site boundary. However, by the 1968 photo, the main Briquette work building was cleared, with a number of additional industrial buildings constructed surrounding the cylindrical building. The current buildings to the east of the cylinder are seen to have developed from 2000 onwards.
- 4.243 A 1992 photograph shows the Rio Tinto Copper Works entirely cleared. A photograph taken in 1999 continues to show the main north-south aligned building of the Metal Refinery Works, with a number of storage units to the north. However, the warehouse buildings at the eastern side of the site had been cleared, with just hardstanding remaining visible. Sporadic vegetation of trees and scrub is also seen in these 1999 photographs, illustrating that this portion of the works was now disused.
- 4.244 Further vegetation is depicted in the 2002 photographs, surrounding the main building, and the majority of storage buildings to the north have been removed, illustrating that the entire main parcel of site is now in disuse.
- 4.245 The late 20th century photographs and 2002 photograph continue to depict the buildings of the Margam Iron and Steel works at the eastern edge of the eastern parcel of site, with associated access roads, vehicles and storage containers. It is therefore evident that this industrial development has only been cleared away in very recent years.
- 4.246 No other cropmark or earthwork features, which infer or suggest the presence of any form of archaeological activity of actual or potential significance, were identified within the site from these aerial photographs.

SITE WALKOVER

- 4.247 The site was visited in July 2022, and again in June and July 2023, to assess the current ground conditions and topography within it, as well as to confirm the continuing survival of any known archaeological remains and to identify any hitherto unknown remains of significance.
- 4.248 The main parcel of site was seen to be largely flat, albeit with occasional natural undulations. It was seen to comprise disused scrub land and dense areas of woodland of mixed species. Due to the densely vegetated nature of this area at the time of both visits, only limited areas could be accessed. These were largely limited to the north-south

orientated area of hardstanding, where the former Metal Refinery Works stood (**Image EDP 37**), as well as limited areas to the east and west of this, as well as the northern edge.

- 4.249 Along with this main body of hard standing, additional areas of hard standing and building detritus were visible to the west (**Image EDP 38**). These features correlate with the positions of the warehouse buildings shown on the 1965 OS map. While the presence of hard standing areas may indicate further buried deposits below, such as foundations for these buildings, it is considered that such features would be of negligible heritage value given their modern date and adequate documentation.
- 4.250 With regard to the tram and rail lines visible on historic mapping, limited evidence of tracks were seen at the southern end of the main area of hardstanding. No further evidence of the tram or rail routes was visible during the site visit, however, given that the south-west corner which contained the main route was not accessible due to vegetation, there is potential for such features to remain.
- 4.251 No remains relating to the Rio Tinto Copper Works in the north-west corner of site were visible, however this area was heavily vegetated so this could not be robustly confirmed. However, the aerial photographs indicate that the site was entirely cleared by the 1990s. Should any elements of the works remain as extant features, or buried deposits, they would also be of negligible interest or significance.
- 4.252 As evidenced by the historic mapping and aerial photographs, the eastern half of the main parcel of site (Davies Carne Hire) was occupied predominantly by modern buildings, largely temporary structures (**Image EDP 39**). At the western edge of this area, a number of brick buildings and large cylindrical metal structures are present, although the cylindrical buildings lie outside of the Site boundary.
- 4.253 These structures appear to correlate with and represent built form from the mid-late 20th Century (**Image EDP 40**). As industrial buildings of modern date, these are not considered to have any heritage value. All of the buildings are situated on hard standing, with occasional areas of overgrown scrub. No evidence of earlier structures, including the Briquette works buildings and associated tram and rail lines, are visible and have most likely entirely cleared for the modern development of the site.
- 4.254 The western parcel of the site was seen to comprise only hard standing, given that industrial buildings were recently demolished. Evidence of brick foundations for these buildings was visible during the site visit (**Image EDP 41**). These foundations likely relate to the most recent built form, but may have origins from the mid 20th century building in this location. As an industrial building of mid 20th century or, more likely, more recent date, these remains are not considered to be of heritage value.
- 4.255 As discussed above, dilapidated remains of the mid 20th century wharf were seen within the northern parcel of site (**Image EDP 42**). However, these have likely undergone a number of repairs and replacements in recent years. As such, these modern remains are considered to be of no greater than negligible heritage significance and do not warrant any form of archaeological investigation/recording.

- 4.256 With regard to the eastern parcel of site, no standing remains related to the industrial buildings of the Margam Iron and Steel Works, such as the storage tanks depicted on historic mapping in the north corner of this parcel, were seen during the site visit. There was, however, an area of rubble in this area, likely resulting from the demolition of these buildings. Similarly, an area of hard standing was evident in the centre of this area, likely relating to the former Steel Works.
- 4.257 An access road was seen running parallel to the docks, as shown on late 20th century mapping. This access road replaced the earlier railway; there was no evidence of former sleepers or tracks seen during the visit, and instead this seems to have been entirely cleared for the new access road. Similarly, there was no evidence of the former tramway located at the northern end of the site. Spoil heaps with rubble building remains were seen across this parcel of site, indicating clearance of this area following the demolition of the industrial buildings.
- 4.258 No other cropmark or earthwork features, which infer or suggest the presence of any form of archaeological activity, were identified during the course of the site visit.

Section 5 Impact Assessment

- 5.1 This section identifies and assesses the likely impacts of the Proposed Development on the historic environment.
- 5.2 In this regard, it identifies and assesses any impacts upon designated and non-designated historic assets in the surrounding landscape (in respect of changes to their setting), as well as impacts upon the site's buried archaeological remains, based on the evidence presented here in **Section 4**.

DESIGNATED ASSETS

- 5.3 As set out in the preceding section (**Section 4**), the site does not contain any designated historic assets, such as listed buildings, and neither does its redline area include any part of a designated historic asset such as an RPG or a conservation area.
- 5.4 There are, however, a number of designated historic assets (principally listed buildings) distributed within the site's wider surroundings which could in theory be indirectly affected by the development proposals through changes within their setting.

Direct Impacts (e.g. During Construction)

- 5.5 It is assessed that there would be no direct impacts on designated historic assets as a result of the proposed development being taken forward and implemented, either during construction or following completion.
- 5.6 In that regard, there would be no direct loss of significance and there would be no harm caused to any of the various designated assets.

Indirect Impacts (e.g. Post-completion)

- 5.7 With regard to 'indirect' impacts (i.e. effects through changes to their setting), Stages 1 and 2 of the setting assessment are set out in **Section 4** of this report.
- 5.8 It is noted that, while changes to the setting of these designated assets will emerge during the construction period as the implementation of the proposed development progresses, it is considered that these potential changes would reach their fullest extent following completion and during the development's subsequent operation. Moreover, in some cases potential setting effects during the construction stage would be temporary and reversible on completion of the development.
- 5.9 As such, it is considered to be more appropriate to identify and assess these potential setting effects over the longer term when they are expected to reach their fullest expression, and thus, any indirect impacts through changes to setting are predominantly focused upon the operation of the Site, post-completion.

- 5.10 With that in mind, **Section 4** established that only the following designated historic assets, located outside the boundary and within the site's wider surroundings, have relationships with the land at the site that makes them potentially sensitive to the implementation of the development proposals as a result of changes to their wider setting. These are all Grade II listed buildings; i.e:
- Former Harbour House (23154);
 - Magistrates Court (23152);
 - Plate Girder Bridge (23153); and
 - Harbour Watch Tower (23155).
- 5.11 The following paragraphs therefore identify and assess the potential impact(s) of development upon these assets, in line with Stage 3 of the setting assessment process described by Cadw.
- 5.12 With regard to those remaining designated assets within the site's wider surroundings, whilst it is noted that there may be glimpsed views achieved of the higher parts of the proposed development following completion, these views would be largely obscured and would be within the context of a setting already heavily defined by industrial development, such that they would not bear upon the understanding or appreciation of the assets.
- 5.13 Likewise, no historic or functional connections have been identified between the site and these assets which might contribute to or bear upon their significance in the form of intangible relationships in a way and to an extent that visual relationships do not.
- 5.14 Hence, it is assessed that none of these other designated historic assets would lose significance and therefore experience 'harm' as a result of the proposed development being taken forward and implemented, either during construction in the short term or following completion and during the operation of the development.

Former Harbour House

- 5.15 It is assessed in **Section 4** (above) that the site forms a peripheral part of the wider surroundings and experience of the Grade II listed former Harbour House (**23154**), whereby it makes a very minor contribution to the setting of the asset, through a former historic and functional association between the building and the surrounding Docks and surrounding land it was designed and constructed to oversee.
- 5.16 However, this connection is no longer appreciable given that the entirety of the site has been cleared of any former industrial buildings or features, with no tangible evidence of this remaining. Moreover, the existing visual relationship between the former Harbour House and the main parcel of site (PDZ) is currently screened by the large built form of the Hanson Cement Factory, so it does not form part of the experience from the building. There is, however, an existing visual relationship between the Harbour House and the TCA which forms the western parcel of the site area, and to a more limited extent, the TCA which forms the eastern parcel of the site.

- 5.17 Both parcels are proposed as temporary construction areas for use during the construction activities within the PDZ. The areas would be used for storage of plant, materials, vehicles and welfare facilities.
- 5.18 Given that these parcels of the site make a very minor contribution to the significance asset, through a former functional relationship, the development of this land would result in a very minor change to the setting of the asset which contributes positively to its significance. However, any views of the proposed construction compound within this parcel of the site would be in the context of the existing industrial development of Tata Steel to the east and Hanson Cement to the south.
- 5.19 This change to the setting of the asset would be limited in its nature, within the context of currently unused and overgrown former industrial land and also restricted to the duration of the development's construction, thus being both temporary and reversible.
- 5.20 Therefore, whilst there would be a small and limited impact on the wider setting of this Grade II listed building during the construction of the proposed development, it is assessed that this would not amount to a loss of significance and therefore harm because of its limited timespan and because the longer term (post-completion) would see a return of the open landscape and a restoration of the asset's wider setting.
- 5.21 The listed building's setting would be preserved over the longer term of the development's operation and so therefore there would be no harm which requires mitigation or compensation in accordance with Stage 4 of Cadw's guidance.

Magistrates Court

- 5.22 It is assessed in **Section 4** that the site forms a peripheral part of the wider setting of the Grade II listed building Magistrates Court (**23152**), whereby it makes a very minor contribution to the overall significance of the asset by virtue of a former historic and functional association with the building, which was originally constructed as the General Offices of the Port Talbot Steel Company.
- 5.23 However, this association is no longer appreciable given that the entirety of site has been cleared of any former industrial buildings or features, with no tangible evidence of this remaining, and neither is there any visual relationship between the site and the asset, due to the intervening and substantial built form of the Hanson Cement Factory.
- 5.24 Given the scale of development within the main parcel of the site, which includes tall industrial buildings such as storage tanks and processing plant, it may be possible to obtain glimpsed views of high points of the development within the site from the Magistrates Court.
- 5.25 Such views would however be obscured and glimpsed from the rear of the building, rather than its front elevation, and would be (1) in keeping with the already industrial nature of the docks and the historic industrial use of the site; and hence not out of character or unexpected in this context; and (2) experienced and appreciated in the context of the already overwhelmingly industrial setting to this building. In that sense, the ability to gain limited and fairly distant glimpses of new industrial development in a landscape which is

characterized by existing industrial development is therefore assessed as being in keeping with the current setting of this 19th century building.

- 5.26 Whilst it is accepted that the proposed development would introduce a 'change' into the general surroundings of this Grade II listed building, it is concluded that this would be both limited and peripheral and hence it would not bear upon the significance of this historic asset or the ability to appreciate that significance. Hence, it is assessed that there would be no loss of significance and therefore no harm to the Grade II listed building that might trigger the need for either mitigation or enhancement measures to be identified and then employed, in accordance with Stage 4 of Cadw's setting guidance.

Plate Girder Bridge

- 5.27 As set out above in **Section 4**, the site forms a peripheral part of the wider setting of the Grade II listed building Plate-Girder Bridge (**23153**) and makes a very minor contribution to the overall significance of the asset by virtue of a former historic and functional association as part of the wider industrial development in this area.
- 5.28 As above, there is no tangible appreciation of this former connection, given that the site has been cleared of any former industrial buildings or features, and there is no visual relationship between the site and the asset, due to the intervening built form of the Hanson Cement Factory.
- 5.29 Given the scale of development within the main parcel of site, which includes tall industrial buildings such as storage tanks and processing plant, it may be possible to obtain glimpsed views of high points of the development within the site from the Bridge. Such views would be obscured glimpses of industrial development within a backdrop already defined by industrial buildings and would be in keeping with the industrial nature of the docks and the historic industrial use of the site in a more general sense.
- 5.30 In common with the magistrates court (above), whilst it is accepted that the proposed development would introduce a 'change' into the wider surroundings of this Grade II listed building, it is concluded that this would be both limited and peripheral and would not bear upon the significance of this historic asset or the ability to appreciate that significance.
- 5.31 Indeed, it is assessed that there would be no loss of significance from this designated historic asset and therefore no harm to the Grade II listed building that might trigger the need for either mitigation or enhancement measures to be identified and then employed, in accordance with Stage 4 of Cadw's setting guidance.

Harbour Watch Tower

- 5.32 As described above in **Section 4**, the site forms a peripheral part of the wider setting of the Grade II listed building Harbour Watch-Tower (**23155**), making a very minor contribution to the significance of this designated asset by virtue of a former historic and functional association as part of the wider industrial development around the docks that the tower was originally erected to oversee.

- 5.33 There is no tangible appreciation of this former connection, given that the site has been cleared of any former industrial buildings or features, and there is no visual relationship between the site and the asset, due to the intervening built form of Puckey House and intervening vegetation.
- 5.34 Given the scale of development proposed within the main parcel of the site, which includes tall industrial buildings such as storage tanks and processing plant, it may be possible to obtain glimpsed views of high points of the development within the site from the Watch Tower.
- 5.35 Nevertheless, any such views would be obscured and glimpsed and also of industrial development within a backdrop already defined by industrial buildings, where they would therefore be in-keeping with the existing industrial nature of the docks and the historic industrial use of the site.
- 5.36 In common with the other Grade II listed buildings (above), whilst it is accepted that the proposed development would introduce a 'change' into the wider surroundings of this Grade II listed building, it is concluded that this would be both limited and peripheral and would not bear upon the significance of this historic asset or the ability to appreciate that significance.
- 5.37 Indeed, it is assessed that there would be no loss of significance from this designated historic asset and therefore no harm to the Grade II listed building that might trigger the need for either mitigation or enhancement measures to be identified and then employed, in accordance with Stage 4 of Cadw's setting guidance.
- 5.38 Insofar as the listed building's setting makes a contribution to its overall significance as a designated historic asset, this contribution would be preserved by the approval and subsequent implementation of the development proposals.

NON-DESIGNATED ASSETS

Historic Landscape

- 5.39 The site is not located within the Margam Mountain Landscape of Special Historic Interest. As such, this landscape would not be directly affected by the proposed development of the site and thus there would be no harm to it in that regard.
- 5.40 With regard to the potential for an 'indirect' impact on the Special Historic Landscape through changes to its setting as a result of the development coming forwards, it is noted that there are limited views of the Site achieved from areas within the Special Historic Landscape, notably from HLCA 003 which offers the best visual experience. However, these views are already overwhelmingly defined by the current industrial backdrop of the development around Port Talbot docks.
- 5.41 Similarly, a limited historic and functional inter-relationship between the industrial archaeology on Site and the history of the Margam Mountain Landscape is identified, notably the Brombil Colliery in HLCA 003 and the rail and tramway network in HLCA 009. Nonetheless, there is no direct connection and this simply reflects the wider

industrialization of Port Talbot. Moreover, any such limited association is no longer appreciable, given that the entirety of the site has been cleared of any former industrial buildings or features, with no tangible evidence of this remaining.

- 5.42 The Site is therefore considered to represent an element of the Special Historic Landscape's wider setting that makes a neutral contribution to its significance as a non-designated historic asset; i.e. it neither adds to or detracts from its significance.
- 5.43 As such, whilst the implementation of the proposed development within the site may result in negligible changes to the setting of the Special Historic Landscape, through changes to the outward views, such changes would not be distinctive within the already heavily developed and industrialised landscape.
- 5.44 Such negligible changes, to an area which does not make a positive contribution to the significance of the Special Historic Landscape, would therefore not bear upon the significance of this historic asset or the ability to appreciate that significance. Hence, it is assessed that there would be no loss of significance and therefore no harm to the Special Historic Landscape that might trigger the need for either mitigation or enhancement measures to be identified and then employed.

Archaeological Sites, Features, Deposits, Remains

- 5.45 The primary effect of the proposed development on known or potential archaeological resources within the site will be the direct truncation and/or removal of buried features, deposits and/or remains during groundworks at the construction stage.
- 5.46 In contrast, it is considered to be highly unlikely that there would be any impact on non-designated archaeological remains following the completion of the proposed development and during its subsequent operation.

Summary of Potential

- 5.47 It is assessed that there is no more than a '**low**' potential for the proposed development of the site to encounter and impact upon significant archaeological features or remains dating from before the post-medieval period and the industrial development associated with the Port Talbot Docks complex, with the available evidence indicating that any earlier horizons are likely to be sealed beneath deep deposits of made ground associated with the industrial development and exploitation of the area.
- 5.48 It is therefore expected that only deeper elements of the proposed development, such as piled foundations etc, would potentially encounter and impact upon these earlier and more significant archaeological remains if they are present.
- 5.49 It is assessed as being more likely that the proposed development of the site will encounter and impact upon archaeological sites, features or remains of post-medieval and later date because they are associated with and represent the industrial development and exploitation of the area and will be preserved closer to the existing ground level and less deeply buried beneath overburden and demolition debris.

- 5.50 Nevertheless, it is still concluded that there is no more than a **low** potential for these archaeological features, deposits and/or remains to be 'significant' because of their relatively recent date, generally poor preservation and relatively commonplace nature.
- 5.51 It is therefore assessed as being most likely (insofar as archaeology is concerned) that the shallower elements of the proposed development, such as ground reduction, levelling, services and the like, will encounter and impact upon non-designated archaeological remains of post-medieval and later date and of no greater than low significance.

Impacts Relating to Implementation of PDZ

- 5.52 The Proposals for the main parcel of site are expected to comprise an initial phase of ground levelling, which will comprise excavation of up to 2.0m in depth across the site, with the deepest areas of excavation being focused at the site's western edge, as well as ground raising in lower areas of the site. This will then allow for the construction of slab foundations at c.2.0m depth with pile driven foundations to a depth of c.20.0m.
- 5.53 Given this construction method, it is considered that the ground levelling and excavation for open-cut foundations would largely encounter modern made ground relating to the construction and demolition of the industrial buildings formerly located on the site. This is supported by the borehole data retrieved from the site, which established that the main parcel within the site is underlain by an average of 2.5m of made ground. Whilst there is potential to encounter buried remains related to the former industrial buildings located across the site, such as foundations, it is assessed as likely that these will have been entirely demolished and cleared given the lack of any structural remains identified during the excavation of the test pits and drilling of the bore holes.
- 5.54 Should any remains related to these modern industrial buildings be encountered, they are considered to be of no greater than low, local value.
- 5.55 Conversely, it is considered to be highly unlikely that the majority of the proposed groundworks will be of a depth sufficient to encounter or result in damage to buried archaeological horizons of significance because these are clearly expected to be overlain by substantial accumulations of modern overburden if indeed they are present at all.
- 5.56 Whilst the piled foundations could potentially encounter and impact upon more deeply buried archaeological strata; which could potentially include features, deposits and/or remains of prehistoric to post-medieval date (albeit with varying degrees of potential), it is considered that the impact would be no more than small in view of the diameter of the piles when compared with the size of the site taken as a whole.

Impacts Relating to Implementation of Compound and Infrastructure Areas

- 5.57 With regard to the northern parcel of the site, it is established that the existing wharf is likely to be of mid 20th Century origin, with later repairs and replacement, and its development is well documented through historic mapping. This feature is considered to be of no heritage value in and of itself. As such, there would be no adverse effect in this regard and no archaeological mitigation is considered warranted in this regard.

- 5.58 With regard to the eastern parcel of the site and the western portion of the main parcel, these two areas are proposed as a temporary compounds and set down areas. The construction of the compounds will include forming a gravel and asphalt surface, requiring a minor amount of surface stripping to allow for a levelled surface to be installed for the duration of the construction phase.
- 5.59 No evidence of the former railway, tramway and storage buildings illustrated on historic mapping in these areas was seen during the site visits. As such, it is considered unlikely that the completion of these shallow works would encounter anything beyond modern ground relating to the construction and demolition of the industrial buildings and features formerly located in this area.
- 5.60 The eastern half of the main parcel (Davies Crane Hire) is currently occupied by industrial buildings, most of which are very modern, temporary buildings erected in the last decades, although a number of brick buildings and metal cylinders on the western edge of this area appear to correlate with buildings seen from the mid to late 20th Century onwards. The cylindrical buildings are excluded from the Site boundary. These buildings are not considered to hold any heritage value. The proposals are for this area to be cleared of all built form to the hard standing level, and then utilised as a compound and set down area.
- 5.61 Given that the brick buildings located within the Site are not considered to be of heritage significance, there would be no effect in this regard and archaeological mitigation is not considered warranted. Similarly, no ground works are proposed beyond limited clearance of scrub, and thus there would be no effect upon any potential buried archaeological remains.
- 5.62 The western parcel of the site (also proposed for a TCA) currently comprises hard standing, with all built form already demolished. No groundworks are anticipated in this area and thus there would be no effect in this regard in terms of the conservation of non-designated archaeological remains.
- 5.63 It is assessed that any features, deposits and/or remains of potential archaeological significance will be buried at such a depth as to remain entirely unaffected by these shallow workings within the temporary compound/set down areas. Therefore, there would be no impact in this regard and no mitigation is warranted for these elements of the overall development proposals.

Conclusions and Mitigation

- 5.64 It is considered to be very unlikely that the implementation of the proposed scheme would have a significant impact on 'non-designated' archaeological remains, in view of the fact that the bulk of the groundworks are expected to lead to the loss of archaeology which is of little or no interest and only the much more focused and restricted piling is anticipated to reach a depth where it could generate a loss of potentially significant deposits, but in that case it is expected to leave the overwhelming majority of the resource intact and unaffected by the development's completion.
- 5.65 Overall, it is assessed that the implementation of the proposed scheme for the site would have no more than a 'minor adverse' impact on buried archaeological remains at the

Construction Stage and no further impacts in this respect are anticipated as being likely to occur subsequently during the development's Operational Stage.

- 5.66 Appropriate and proportionate mitigation for this limited impact on sub-surface archaeology would comprise the completion of a watching brief during the open cut excavation across the main parcel of the site (PDZ area), or a phase of evaluation trenching, to identify and record any archaeological features, deposits or remains of interest that would be either destroyed or damaged by the implementation of the works. This would be agreed in advance with the local authority's archaeological advisors at GGAT and then detailed in a Written Scheme of Investigation (WSI) submitted to and approved by GGAT as a condition of planning permission being granted for the development.
- 5.67 No archaeological monitoring, observation or recording is proposed in respect of the piled foundations, or the very shallow workings relating to surfacing of the TCAs, and in addition no archaeological investigation is considered to be necessary or possible prior to the positive determination of the planning application because of the limited archaeological interest of the site and the extent of the Japanese Knotweed contamination making the completion of trial trench evaluation practically impossible.

Section 6 Conclusions

- 6.1 This Archaeological and Heritage Assessment has been prepared by EDP for Lanzatech UK Ltd and in respect of the preparation, submission and positive determination of development proposals for a jet fuel plant with associated infrastructure.
- 6.2 It concludes that the implementation of the proposed development would have no direct impact on designated historic assets (such as listed buildings and scheduled monuments) because there are no designated historic assets located within the site and the site's boundary does not take in or include any part of such an asset.
- 6.3 It is similarly concluded that the approval and implementation of the proposed development would not result in a loss of significance from any one of the designated heritage assets located within the site's wider surroundings.
- 6.4 This conclusion is reached on the basis that, whilst as existing the site might form part of their wider setting, it is typically a small and peripheral aspect and where its relationship with the former industrial land which makes up the site is no more than limited. Equally, it is considered that the proposals themselves fit within a pattern of land use and industrial construction which is still typical of the area and so, hence, whilst there might be a change within the general surroundings of some of the designated assets distributed around the site's boundaries, this would not bear upon their significance and cause a loss of heritage significance and therefore 'harm'.
- 6.5 In terms of 'non-designated' historic assets, the assessment does not identify any indirect effects to the Registered Landscape of Special Historic Interest. Whilst negligible changes to its setting are anticipated in terms of the distant views of the site looking outwards, the views are already defined by the existing industrial development at Port Talbot and so as a result it is assessed that these negligible changes would not result in a loss of significance from the Landscape of Special Historic Interest. No harm would result from the proposals' completion.
- 6.6 In addition, it is assessed that the implementation of the proposed scheme for the site would have no more than a 'minor adverse' impact on buried archaeological remains at the Construction Stage and no further impacts in this respect are anticipated as being likely to occur subsequently during the development's Operational Stage.
- 6.7 This assessment is made on the basis that there is generally no more than a 'low' potential for the proposed development to encounter and impact upon the conservation of significant archaeological sites, features and/or remains.
- 6.8 Any horizons or deposits of earlier than post-medieval date, which might hence be of more than low significance, are expected to be deeply buried beneath deposits of modern made ground and therefore only potentially encountered by the deepest elements of the proposed development, such as piles for the buildings' foundations. In contrast, the shallower horizons and deposits are very likely to derive from post-medieval and later activity at the

site and be of no more than low or local significance, even though it is their conservation that is more likely to be impacted by the implementation of the proposals.

- 6.9 Appropriate and proportionate mitigation for this limited impact on sub-surface archaeology would comprise the completion of a watching brief during the open cut excavation for construction, or a programme of archaeological trial trenching, to identify and record any archaeological features, deposits or remains of interest that would be either destroyed or damaged by the implementation of the works. This would be agreed in advance with the local authority's archaeological advisors at GGAT and then detailed in a WSI submitted to and approved by GGAT as a condition of planning permission being granted for the development.
- 6.10 No archaeological monitoring, observation or recording is proposed in respect of the piled foundations, or the very shallow workings relating to surfacing of the TCAs. In addition no archaeological investigation is considered to be necessary or possible prior to the positive determination of the planning application because of the limited archaeological interest of the site and the extent of the Japanese Knotweed contamination making the completion of trial trench evaluation practically impossible.
- 6.11 If this proposed approach to archeological mitigation during construction is adopted and applied, there is no reason in terms of either archaeology or heritage impact why planning permission for this development should not be granted by the Local Authority, as the development which is proposed for the site would accord with the relevant planning policies for the conservation and management of the historic environment in Wales.

Section 7 References

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Cadw, 2011 Conservation Principles, Policies and Guidance for the Sustainable management of the Historic Environment in Wales, Swansea

Neath Port Talbot County Borough Council, 2016. Local Development Plan (2011-2026)

Welsh Government, 2021 Planning Policy Wales Edition Eleven, Cardiff

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

LIST OF CONSULTED MAPS

Margam Estate Map, 1814

The First Edition Ordnance Survey Map, 1876

The Second Edition Ordnance Survey Map, 1885

The 1900 Edition Ordnance Survey Map

The 1921 Edition Ordnance Survey Map

The 1945 Edition Ordnance Survey Map

The 1965 Edition Ordnance Survey Map

Appendix EDP 1 Images



Image EDP A1.1: View north-west of the Grade II listed Harbour House, illustrating evidential and aesthetic values, as well as its visibility from the north-west boundary of site.



Image EDP A1.2: View north illustrating the immediate setting of the Grade II* listed Church of St Theodore to be its well vegetated churchyard.



Image EDP A1.3: View west from the eastern parcel of site, illustrating a limited visual relationship with the Grade II listed Harbour House.



Image EDP A1.4: View south-west towards site from the Grade II* listed Church of St Theodore, illustrating views are screened by the built form of the row of housing immediately opposite. Any glimpses of the tall parts of the development, such as the flare chimney, would be in the context of current glimpses of industrial chimneys.



Image EDP A1.5: View north from eastern parcel of site, illustrating distant, obscured views to the Grade II* listed Church of St Theodore, and Grade II listed Dyffryn Chapel in the background. Such views don't allow for an appreciation of the evidential and aesthetic value of the assets.



Image EDP A1.6: View north-east of Grade II listed Gateway and pair of Lodges to Talbot Memorial Park, illustrating its evidential and aesthetic values derived from its built fabric and form, as well as the historic interest derived from the appreciable function as a memorial.



Image EDP A1.7: View north-east of Grade II* War Memorial within Talbot Memorial Park, illustrating its evidential and aesthetic values derived from its built form and fabric, as well as the historic value derived from the appreciable function as a memorial.



Image EDP A1.8: View east from the Harbour Watch Tower, illustrating that views towards the site are screened by built and vegetated form.



Image EDP A1.9: View west from HLCA 003, illustrating views towards the site can be achieved, but within a landscape already overwhelmingly defined by industrial form.



Image EDP A1.10: View west from the eastern point of HLCA 004, illustrating its agricultural nature and that no views towards site are achieved, due to the rising topography of the ground.



Image EDP A1.11: View west from HLCA 009, illustrating its residential nature, and that no views towards site are achieved, due to the intervening-built form and the rising topography of the ground.



Image EDP A1.12: View west from the eastern point of HLCA 017, illustrating its agriculture nature, and that no views towards site are achieved, due to the rising topography of the ground.



Image EDP A1.13: View south of area of hardstanding on site, where the main factory building of the Metal Refinery Works stood. Evidence of rail lines visible towards the southern end of this.



Image EDP A1.14: View east of area of hardstanding on site, where the ancillary factory buildings of the Metal Refinery Works stood.



Image EDP A1.15: View west of modern, temporary buildings within the Davies Cran Hire portion of site.



Image EDP A1.16: View north illustrating brick and cylindrical buildings within the Davies Crane Portion of site, which likely have mid to late 20th century origins.



Image EDP A1.17: View east across western parcel of site, illustrating its composition of hard standing, with some evidence of foundations, likely from the late 20th Century buildings



Image EDP A1.18: View west of the existing wharf in the northern parcel of site, shown to be dilapidated and disused, and likely of mid-20th Century date with later alterations.

Appendix EDP 2

Table of Designated Heritage Assets within 3km

Type of Asset	Reference No.	Name	Grade	Description
Registered Park and Garden and Historic Park and Garden	GM45	Port Talbot: Talbot Memorial Park	II	Small, well preserved urban public park with a fine central bandstand and war memorial. The commemorative character of the park is emphasized by the main gate, which is dedicated to Rupert Price Hallowes, VC (1881-1915).
Listed Building	14160	Church of St Theodore	II*	Set within a rectangular walled churchyard, this is a powerful example of the Early English style in late Victorian architecture by a nationally important architect. The largest church designed in Wales by JL Pearson.
Listed Building	14172	Beulah Calvinistic Methodist Chapel	II*	Lombardic-style chapel built in 1838 as part of the planned village of Groes, which replaced Margam village when C R M Talbot decided to enlarge Margam Park. The chapel was taken down in 1974 in advance of M4 motorway works, and was rebuilt in Tollgate Park, Margam, in 1976.
Listed Building	14174	Ebenezer Chapel	II*	Unusually finely detailed building in scarce Romanesque style by a nationally-important chapel architect, George Morgan of Carmarthen, and one of a group of four in Wales using Romanesque and Lombardic styles.
Listed Building	23256	War Memorial	II*	The focal point of the memorial park, in the centre of the main avenue. The memorial has bronze work by sculptor Louise Frederick Roslyn (1878-1949), and plinth by architects Lanchester, Lucas and Lodge, of Scottish granite.
Listed Building	22136	Plaza Cinema	II	Built in 1939, opened Easter 1940. Completion delayed due to war. Modernist style with Art Deco influences.
Listed Building	22807	Carnegie Free Library	II	Built using grant from the Carnegie Trust in 1913. Constructed of rock-faced coursed grey stone, contrasting with pale stone dressings.
Listed Building	22808	Milepost	II	One of a group of mileposts in Gothic style, associated with the turnpiking of the Swansea to London Road (now A48).

Type of Asset	Reference No.	Name	Grade	Description
Listed Building	22803	Church of St Joseph	II	Roman Catholic church of 1930, by F R Bates and Son. Early Christian style with basilican interior, replacing an earlier church of 1862.
Listed Building	22804/14173	Aberavon Bridge	II	Bridge across the River Afan, built in 1842 to the design of William Kirkhouse, engineer of the Tennant Canal. Later widened by half, probably in 1893.
Listed Building	22805	Forecourt Walls, Railings and Gates to Ebenezer Chapel	II	Centrally-placed ashlar gate piers with chamfered angles, bases with chamfered top edges and ornate capstones, flanked by low snecked walls with saddleback ashlar copings, supporting short iron railings.
Listed Building	22806	Gibeon Chapel	II	Prominently sited on the edge of a triangular green in the centre of Tai Bach, this is a large gable-entry chapel in reduced classical style. First Gibeon chapel constructed in 1861, completely rebuilt in 1909-10 to increase size.
Listed Building	22813	Sunray	II	A two-storey suburban house influenced by the Modern Movement and with Art Deco styling, of roughcast walls painted white and a flat roof concealed behind a plain parapet.
Listed Building	23248	Holy Cross Church	II	Chapel-of-ease by Edward Haycock in a pre-archaeological Gothic style erected in 1827. Small cruciform-plan church in Gothic style.
Listed Building	23253	Dyffryn Chapel	II	Classical-style chapel dated 1893, replacing an earlier chapel on the site of 1841.
Listed Building	23254	Grove Place Chapel	II	Built in 1904 and listed primarily for its exceptionally finely detailed interior, a good example of the revival in non-conformism at this date.
Listed Building	23255	Gateway to Talbot Memorial Park	II	Triple-arched gateway of pale ashlar stone. Wide centrally-placed Tudor arch with reeded moulding, flanked by narrow pointed arches with similar mouldings, dated 1925.
Listed Building	23249	Afan Masonic Temple	II	Classical-style temple, built in 1909 using money provided by Elizabeth Talbot, sister of Theodore.
Listed Building	23250	Velindre Bridge	II	Early 19 th century horse-drawn railway bridge. Associated with the development of industry in Cwmavon and providing an export route towards the docks which were established in Aberavon in 1837.

Type of Asset	Reference No.	Name	Grade	Description
Listed Building	23251	Tabernacle Chapel	II	Chapel built in 1909 with Gothic-style exterior. The land was given by Emily Charlotte Talbot of Margam Park on the premise that the front of the chapel should look like a church; it has a tower (the spire now removed) and a large traceried gallery window.
Listed Building	23252	Bethany Chapel	II	In a prominent position in the centre of Port Talbot, this two-storey chapel over semi-basement schoolroom with three-bay gable end façade. Foundation stone laid 1879.
Listed Building	23257	Fountain in Honour of John Hopkin Davies	II	Granite water fountain with bronze sculpture, in the Talbot Memorial Park, in honour of the doctor, John Hopkin Davies, who was brought to Tai Bach in 1872 by Theodore Talbot of Margam Park.
Listed Building	23258	Bandstand	II	Octagonal bandstand with cast iron columns supporting a domed roof with cupola, in the Talbot Memorial Park.
Listed Building	22852	Plate-Girder Bridge	II	Two-carriageway road bridge dated 1903, panning the River Afan just upstream of the navigable section, and linking Sandfields with the docks.
Listed Building	23259	Lodge 2, Talbot Memorial Park	II	One of two matching lodges which are mirror images of each other, adjoining the eastern end of the gateway to the Talbot Memorial Park. Constructed of coursed grey rock-faced stone with pale stone dressings, under a replaced slate covered roof.
Listed Building	22853	War Memorial	II	A tapering pier surmounted by a Celtic cross and constructed of rendered concrete, located in the centre of the Talbot Memorial Park.
Listed Building	23260	Lodge 1, Talbot Memorial Park	II	One of two matching lodges which are mirror images of each other, adjoining the western end of the gateway to the Talbot Memorial Park. Constructed of coursed grey rock-faced stone with pale stone dressings, under a replaced slate covered roof.
Listed Building	23154	Former Harbour House	II	Tudor-Gothic style building, probably dating to mid-late 19 th century, located on the north side of New Dock.
Listed Building	23155	Harbour Watch-Tower	II	Two-storey octagonal watch-tower with battlemented parapets, probably mid-century.
Listed Building	23282	Vestry at Beulah Chapel	II	Located in Tollgate Park immediately north of Beulah Chapel and almost adjoining it, the vestry is contemporary with the chapel, and was moved to this location in 1976, having been affected by the building of the M4.

Type of Asset	Reference No.	Name	Grade	Description
Listed Building	23283	Gates, Piers and Railings at Beulah Chapel	II	Forming an enclosure in front of the entrance to Beulah Chapel, alongside the road, the gate piers and railings are contemporary with Beulah Chapel, and were moved to this location in 1976, having been affected by the building of the M4.
Listed Building	23284	Milepost at Tollgate Park	II	One of a group of mileposts in Gothic style, associated with the turnpiking of the A48. This milepost was moved from a roundabout on the site of Tollgate Park.
Listed Building	23152	Magistrates Court	II	Built as the General Offices of the Port Talbot Steel Company in the early C20, in the Neo-Georgian style.
Listed Building	23153	Plate-Girder Bridge	II	Two-carriageway road bridge dated 1903. Spanning the River Afan just upstream of the navigable section and set at an angle to the river, it was built following major development of Port Talbot docks in the late 1890s, and provided the main access to the docks from Aberavon and the west side of the river.
Listed Building	22802	Church of St Mary	II	Church of medieval origin, first mentioned in 1254, in Gothic style with geometrical tracery.
Registered Landscape of Outstanding Historic Interest	HLW (WGI/MGI) 2	Margam Mountain	Special	Margam Mountain is a distinctive block of South Wales uplands on the south-west fringe of the Glamorgan Blaenau, where they meet the Bro and overlook and visually dominate the narrow coastal plain near the modern port and industrial town of Port Talbot. The historic landscape identified here is dominated by the steep southern flanks of Margam Mountain, a strategic location which controlled early routes to West Wales, including the main Roman road linking the Roman forts of Cardiff and Neath.
Scheduled Monument	2868	Ergyd Isaf Round Barrows		The remains of two burial cairns, probably dating to the Bronze Age (c. 2300 - 800 BC).

Plans

Plan EDP 1: Overview of Historic Assets overlaid on Zone of Theoretical Visibility
(edp7470_d008e 11 August 2023 DJo/EBR)

Plan EDP 2: Overview of Historic Assets within 3km
(edp7470_d003d 11 August 2023 DJo/EBR)

Plan EDP 3: Overview of Designated Historic Assets within 1km
(edp7470_d002d 11 August 2023 DJo/EBR)

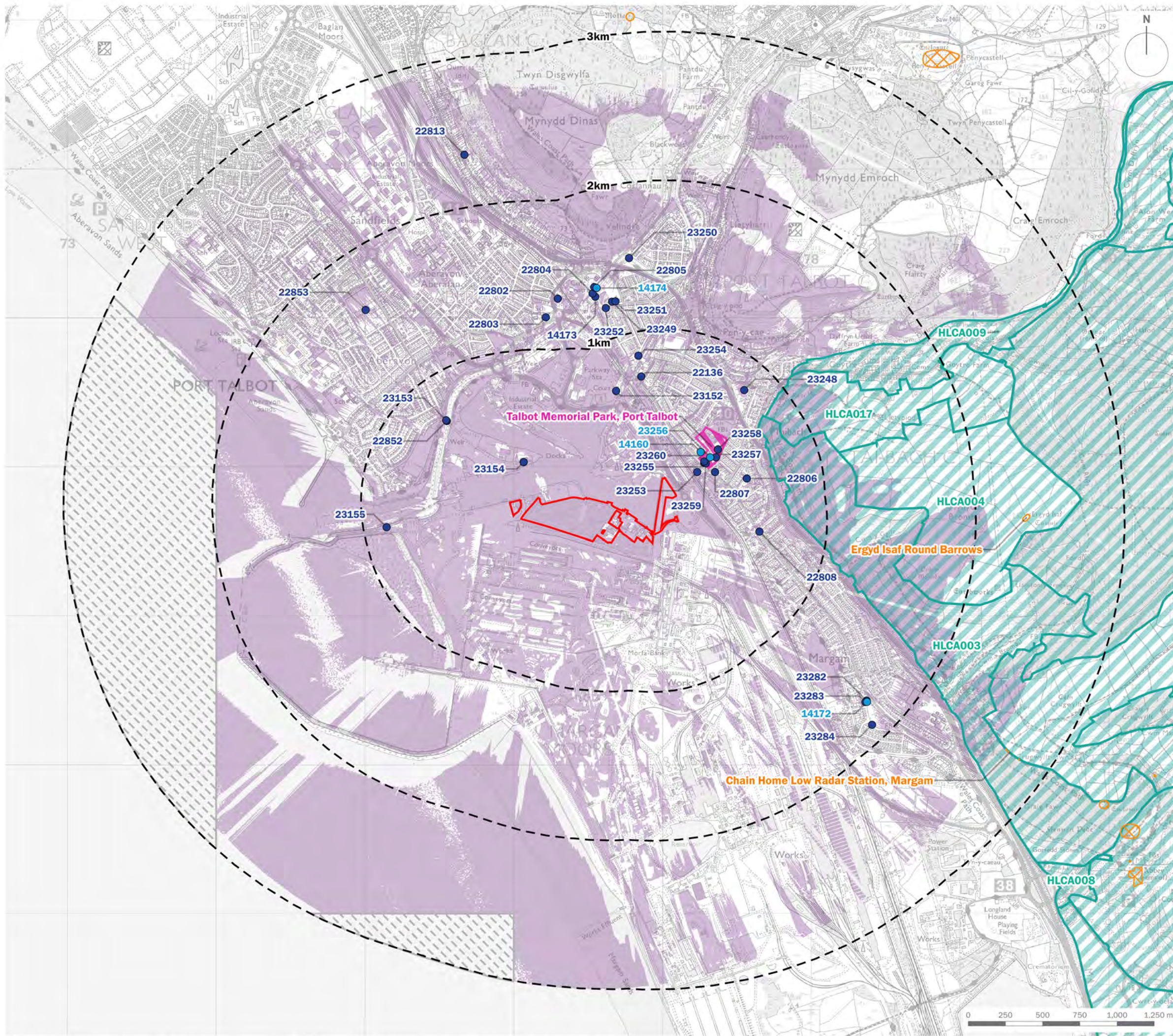
Plan EDP 4: Overview of Non-designated Historic Assets and HER Events
(edp7470_d004d 11 August 2023 VMS/EBR)

Plan EDP 5: Overview of Non-designated Historic Assets (NMRW Records)
(edp7470_d005d 11 August 2023 VMS/EBR)

Plan EDP 6: Overview of Margam Mountain Registered Landscape of Special Historic Interest
(edp7470_d009d 11 August 2023 VMS/EBR)

Plan EDP 7: Extract of the 1814 Margam Estate Map
(edp7470_d006d 11 August 2023 VMS/EBR)

Plan EDP 8: Overview of Historic OS Mapping
(edp7470_d007d 11 August 2023 VMS/EBR)



Site Boundary

Range Rings (at 1km intervals)

Heritage Assets

- Grade II* Listed Building
- Grade II Listed Building
- Registered Park and Garden
- Scheduled Monument
- Margam Mountain Registered Landscape

Zone of Theoretical Visibility

- Zone of Theoretical Visibility (ZTV) LiDAR Data Using 2m Digital Surface Model (DSM)
- LiDAR - No Coverage

Note

Zone of Theoretical Visibility (ZTV) was calculated using a spatial modelling algorithm which considers the following parameters:

- 1.6m Receptor Elevation (Observer Height)
- 90m Maximum Height
- 360 Degree Field of View
- LiDAR 2m Digital Surface Model (DSM) (vertical accuracy of +/- 5cm)

client
Lanzatech UK Ltd

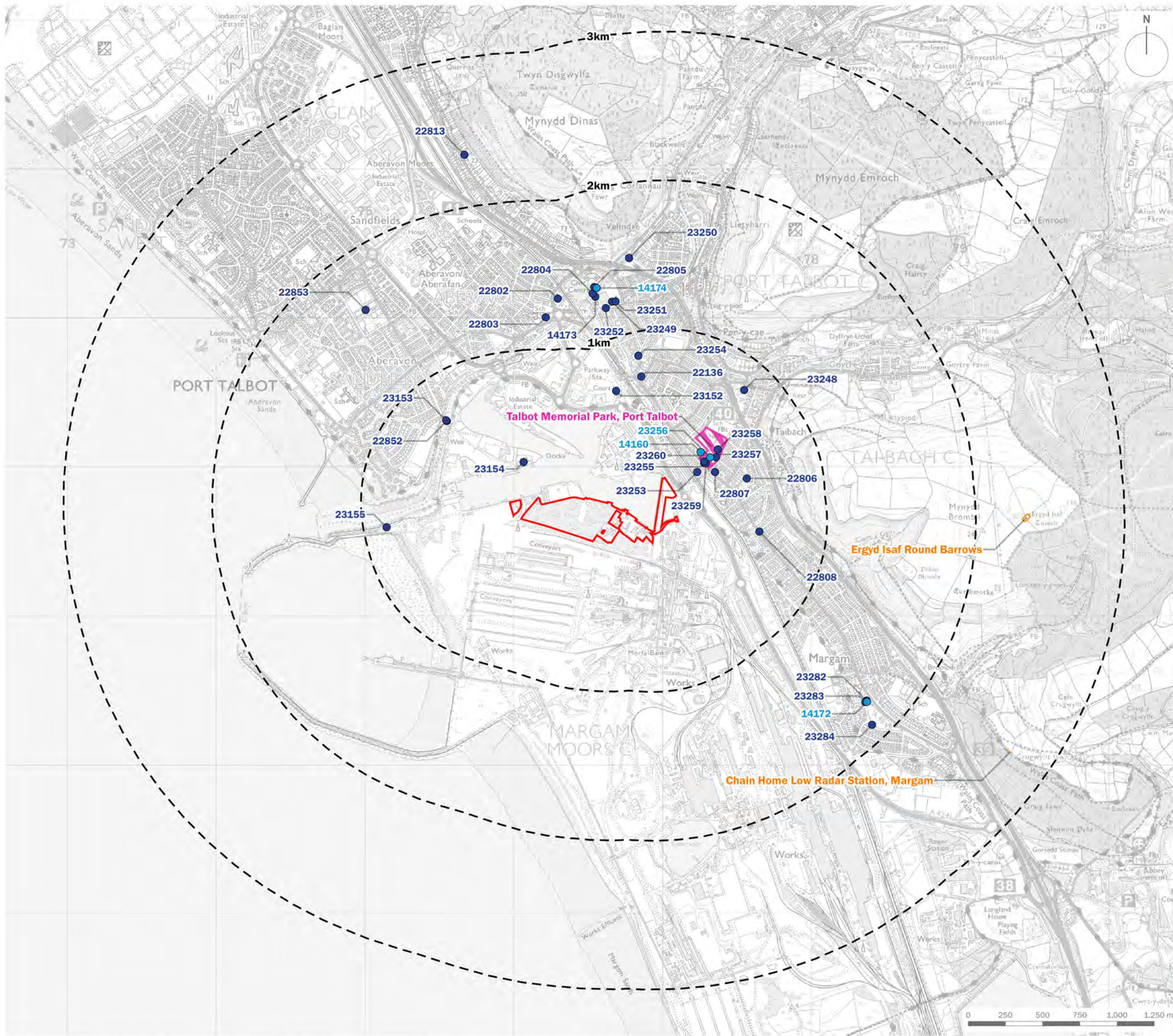
project title
Crown Wharf, Port Talbot Docks

drawing title
Plan EDP 1: Overview of Historic Assets overlaid on Zone of Theoretical Visibility

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drawing number	edp7470_d008e	checked	EBR
scale	1:25,000 @ A3	QA	GYo



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Site Boundary

Range Rings (at 1km intervals)

Heritage Assets

- Grade II* Listed Building
- Grade II Listed Building
- Registered Park and Garden
- Scheduled Monument

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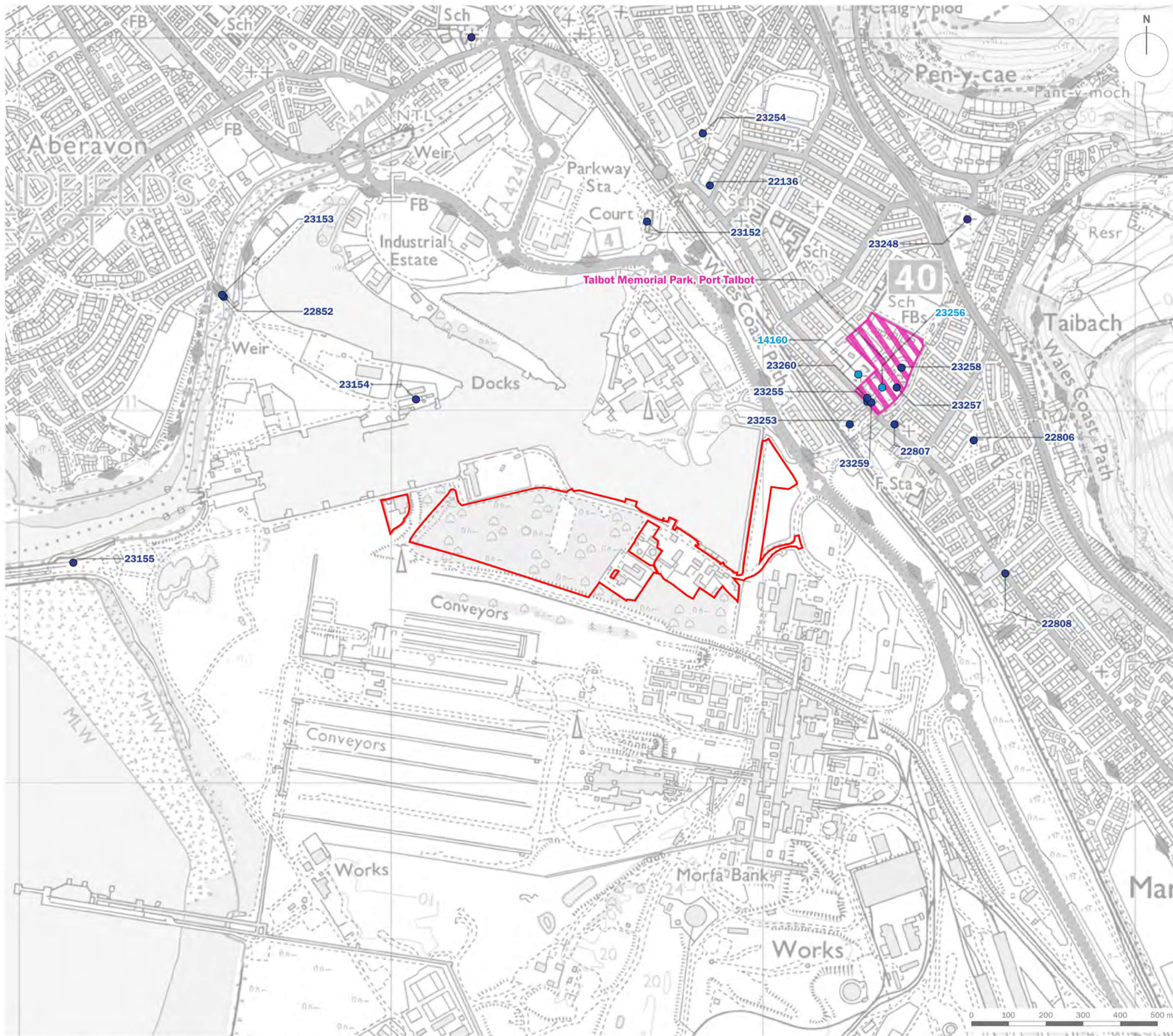
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Plan EDP 2: Overview of Historic Assets within 3km

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scale	1:25,000 @ A3	QA	GYo



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-  Site Boundary
-  1km Range Ring
-  Grade II* Listed Building
-  Grade II Listed Building
-  Registered Park and Garden

client
Lanzatech UK Ltd

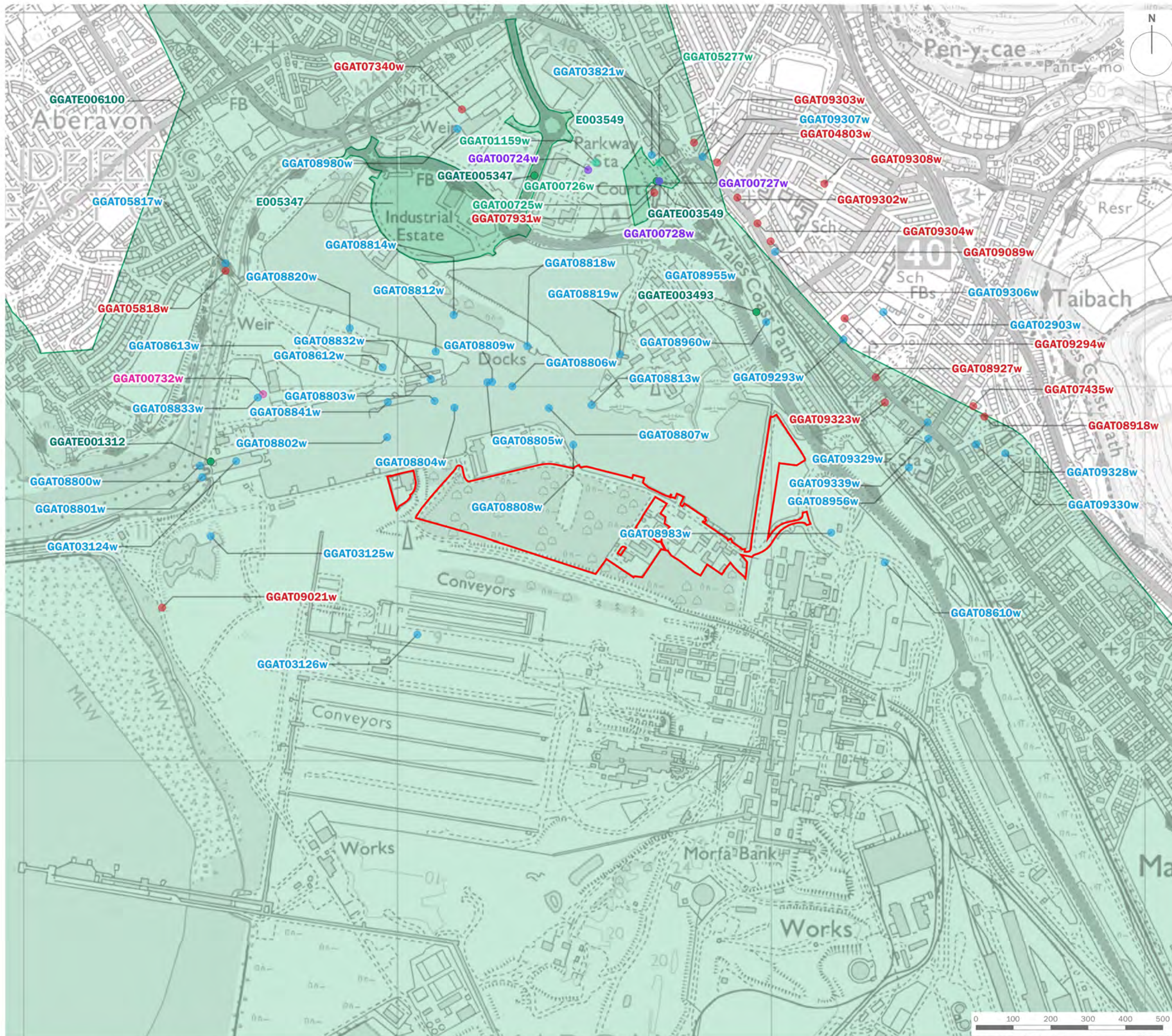
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drawing title
Plan EDP 3: Overview of Designated Historic Assets within 1km

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scale	1:10,000 @ A3	QA	GYo



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- Site Boundary
 - HER Event
- HER Monument**
- Roman
 - Early Medieval
 - Medieval
 - Post Medieval
 - Modern

client
Lanzatech UK Ltd

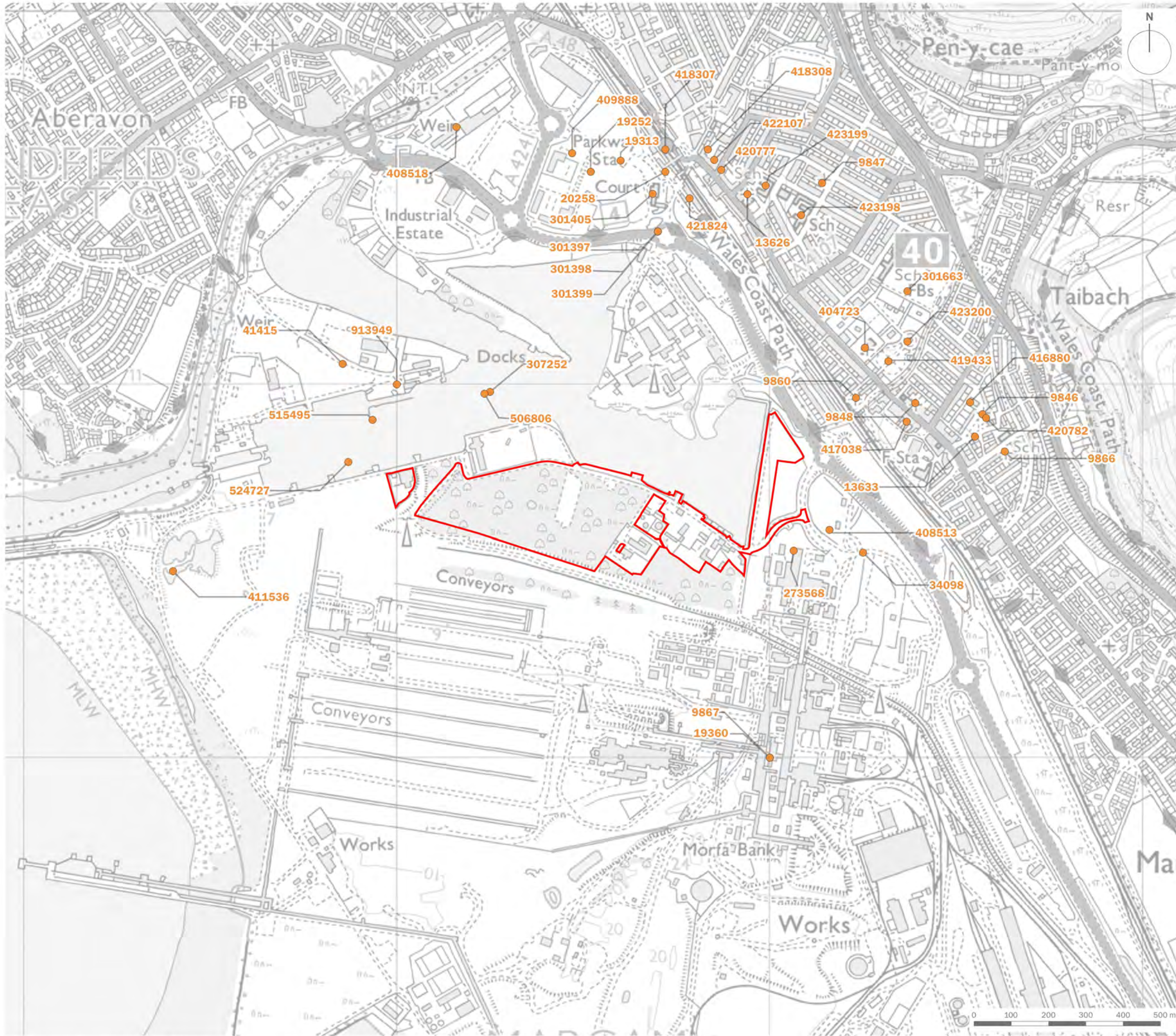
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drawing title
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scale	1:10,000 @ A3	QA	GYo



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- Site Boundary
- NMRW Data

client	Lanzatech UK Ltd	
project title	Crown Wharf, Port Talbot Docks	
drawing title	Plan EDP 5: Overview of Non-designated Historic Assets (NMRW Records)	
date	11 AUGUST 2023	drawn by VMS
drawing number	edp7470_d005d	checked EBR
scale	1:10,000 @ A3	QA GYo



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-  Site Boundary
-  Range Rings (at 1km intervals)
-  Margam Mountain Registered Landscape

client
Lanzatech UK Ltd

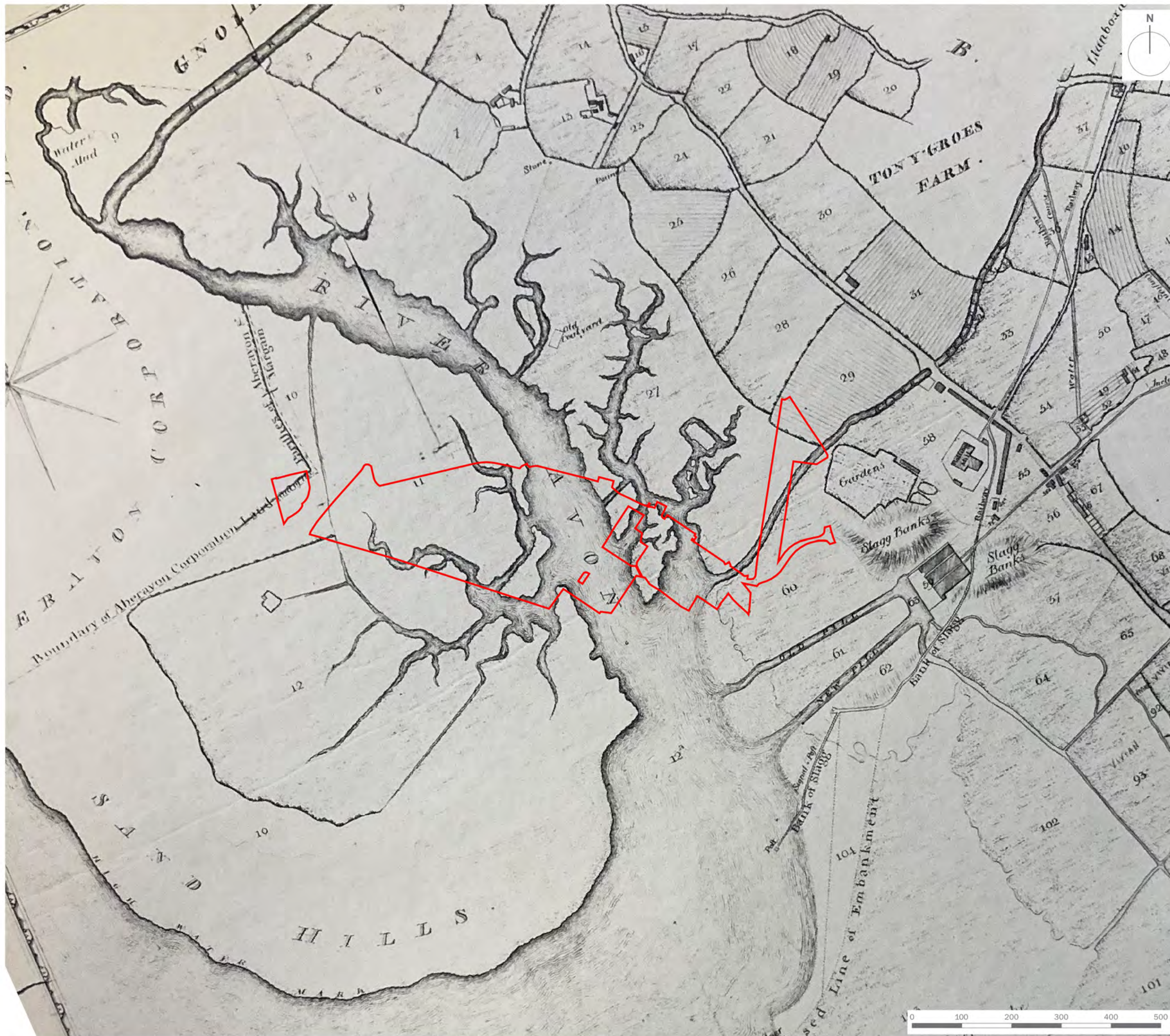
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drawing title
Plan EDP 6: Overview of Margam Mountain Registered Landscape of Special Historic Interest

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 Approximate Site Boundary

client
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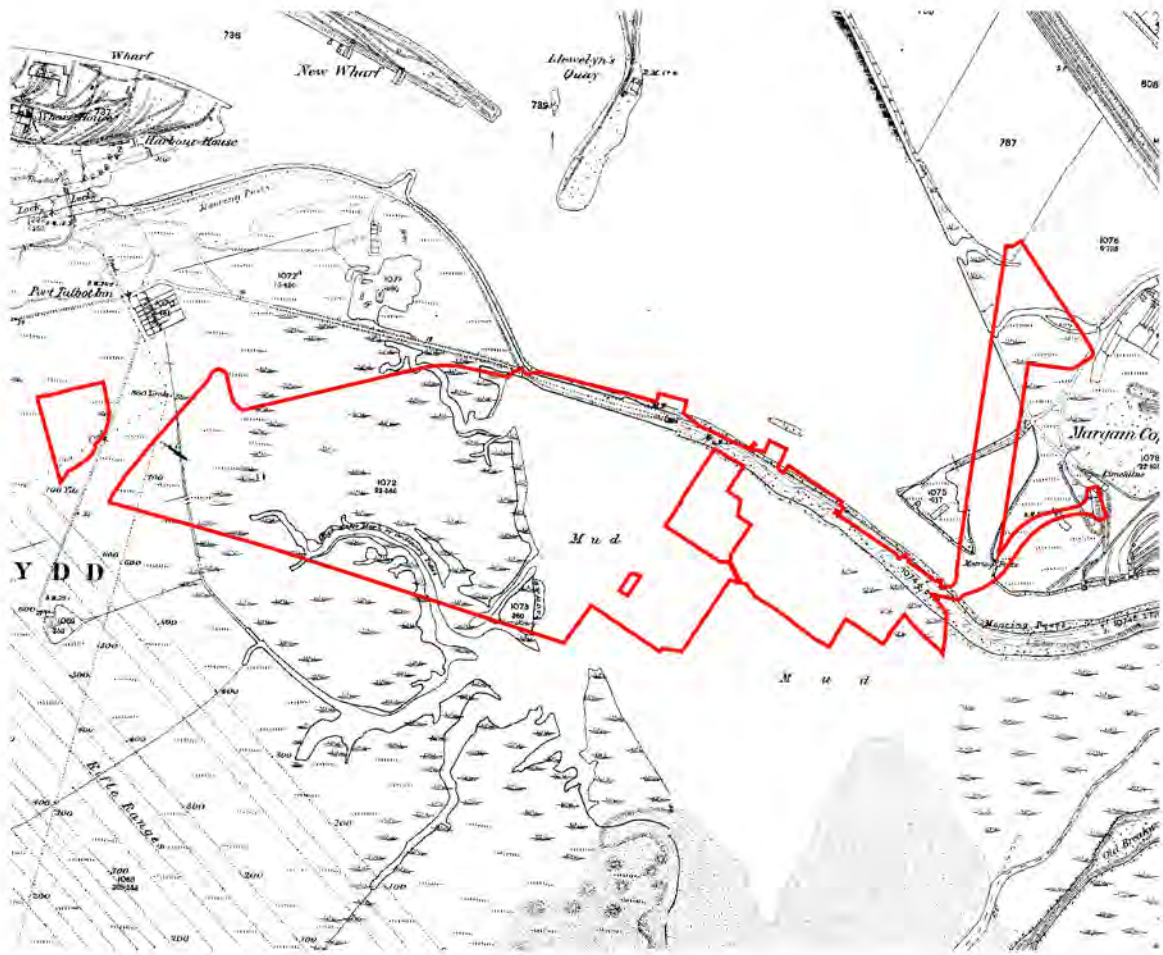
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drawing title
Plan EDP 7: Extract of the 1814 Margam Estate Map

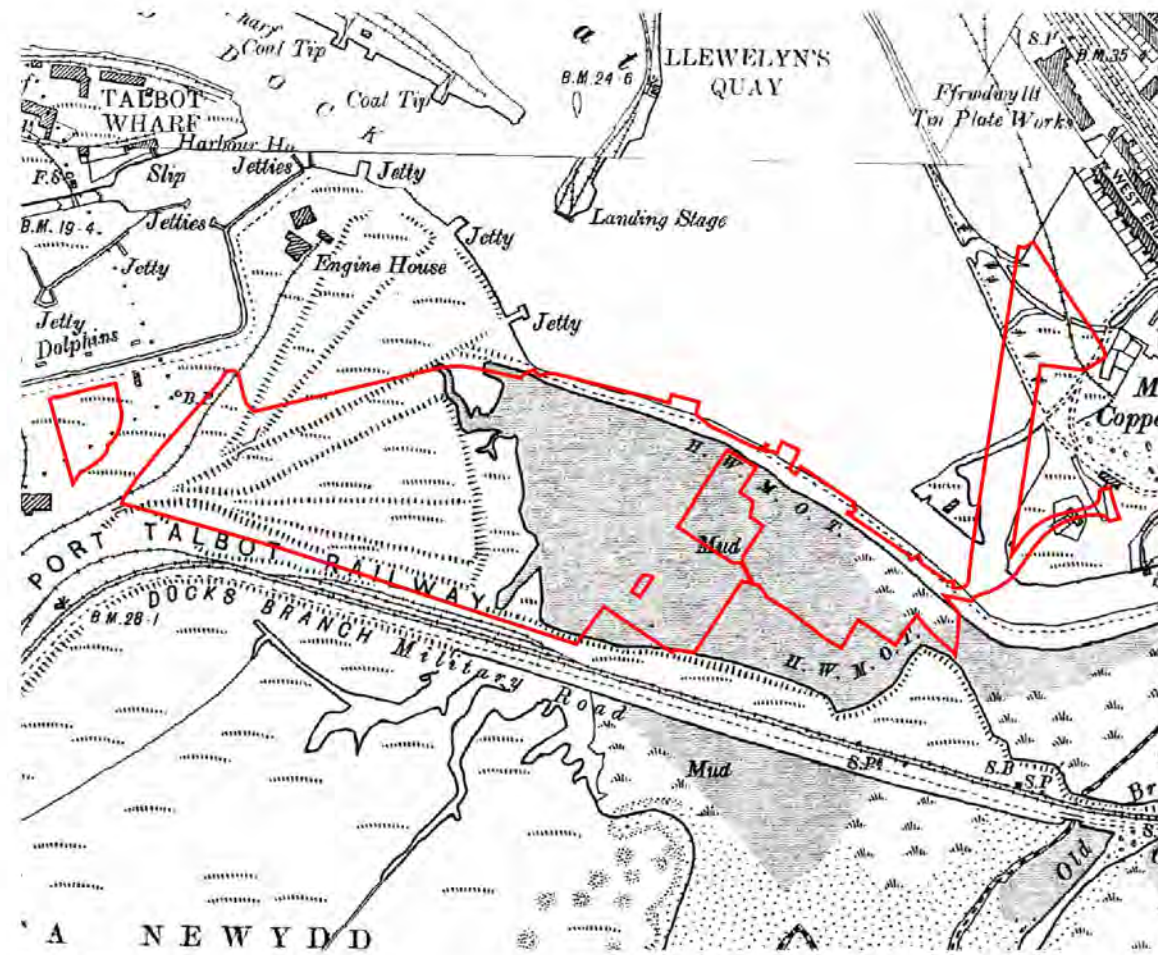
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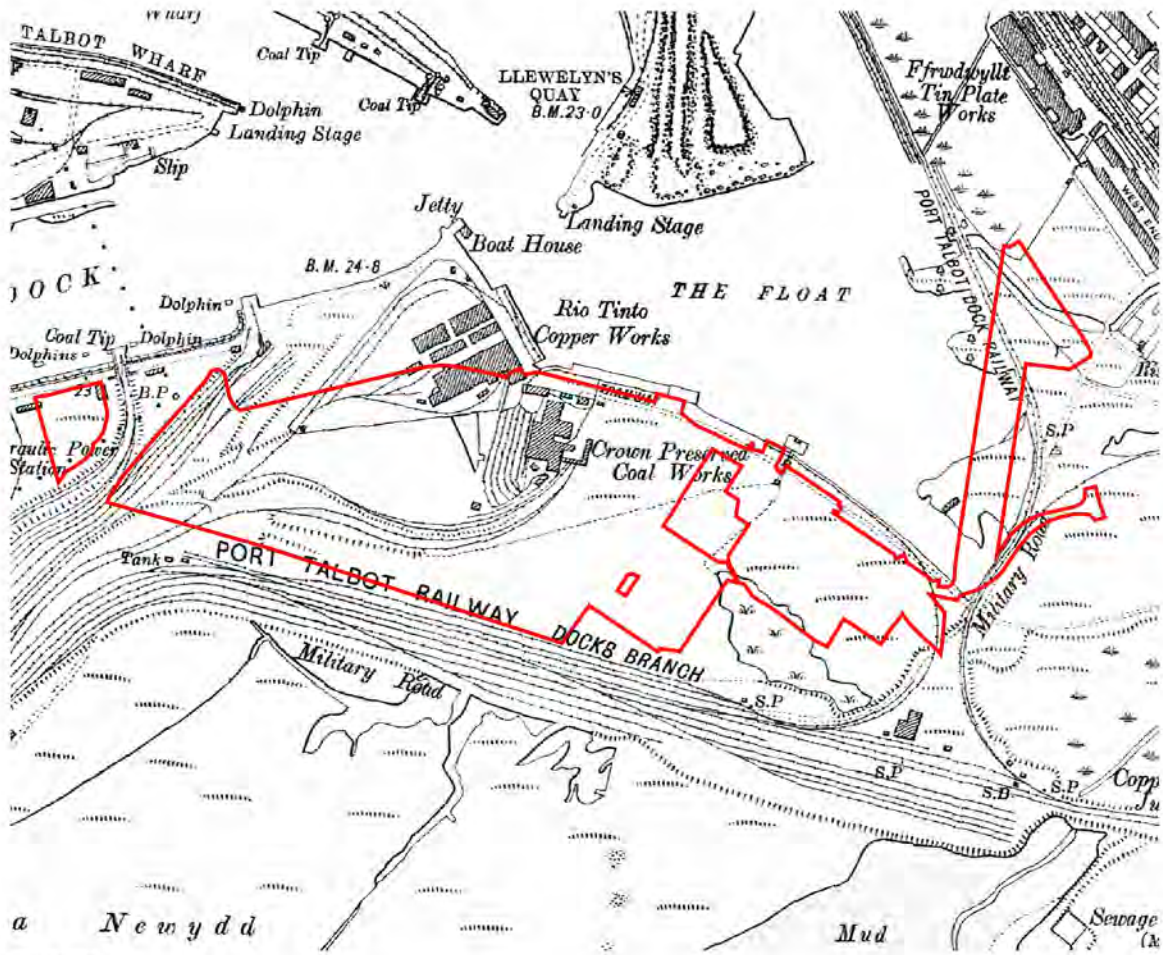
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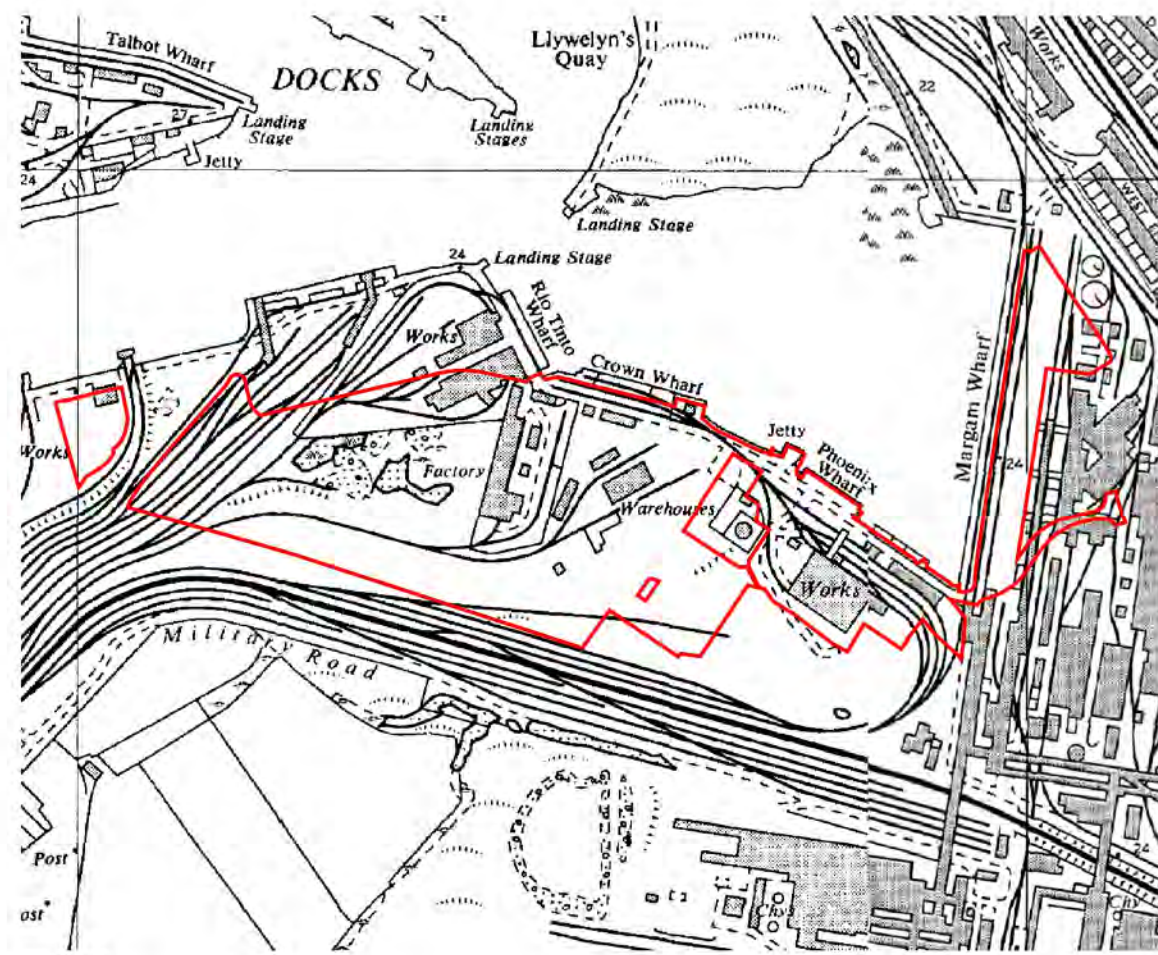
OS 1876-1877



OS 1900



OS 1921



OS 1965

 Approximate Site Boundary



client
Lanzatech UK Ltd

project title
Crown Wharf, Port Talbot Docks

drawing title
Plan EDP B: Overview of Historic OS Mapping

date **11 AUGUST 2023** drawn by **VMS**
drawing number **edp7470_d007d** checked **EBR**
scale **1:8,000 @ A3** QA **GYo**



Registered office: 01285 740427 · www.edp-uk.co.uk · info@edp-uk.co.uk



CARDIFF
02921 671900

CHELTENHAM
01242 903110

CIRENCESTER
01285 740427

info@edp-uk.co.uk
www.edp-uk.co.uk

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