

Land To North of Brecon Ind. Est., South of A40/A470 Roundabout, Brecon

*Written Scheme of Investigation for a Historic
Environment Desk-Based Assessment*

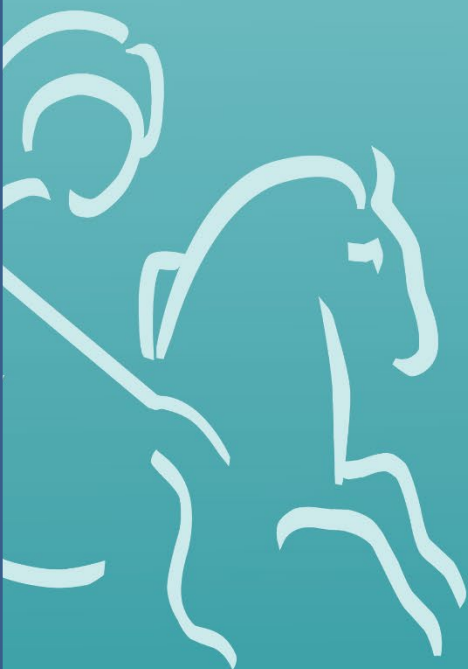


Report prepared for:
Carney Sweeney (Cardiff)

CA Project: CR2288

CA Report: CR2288_1

August 2026



Land To North of Brecon Ind. Est., South of A40/A470 Roundabout, Brecon

Written Scheme of Investigation for a Historic Environment Desk- Based Assessment

CA Project: CR2288

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Pre-application planning ref.: 26/24839/PAYPRE

prepared by	Hannah Burke, Heritage Consultant
date	August 2026
approved by	Zoe Arkley, Senior Heritage Consultant
signed	
date	August 2026

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1. INTRODUCTION

- 1.1. This Written Scheme of Investigation (WSI) was prepared in August 2026 by Cotswold Archaeology, a Registered Organisation with the Chartered Institute for Archaeologists. It sets out a scope and methodology for a Historic Environment Desk-Based Assessment of Land To North of Brecon Ind. Est., South of A40/A470 Roundabout, Brecon (NGR: 303195, 228277; Fig. 1). The WSI has been commissioned by Carney Sweeney (Cardiff).
- 1.2. This WSI has been guided in its composition by the 'Standard and Guidance for Historic Environment Desk-Based Assessment' (ClfA 2020a), Planning Policy Wales (Welsh Government 2024), and Technical Advice Note (TAN) 24: The Historic Environment (Welsh Government 2026). The desk-based assessment will be subject to the approval of the WSI by the Planning Archaeologist at Bannau Brycheiniog National Park Authority (BBNPA), to seek agreement on the scope and methodology of the project, prior to undertaking the assessment. Upon completion a copy of the document will be sent to a suitable receiving institution, usually the relevant Local Authority museums service, Heneb and the Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW) for deposition.

2. BACKGROUND

- 2.1. The Site is a triangular field to the south-western edge of the settlement of Brecon approximately 1.2 Ha in size. It is generally level, apart from where it drops to the river. The A470 Trunk Road forms the north-western boundary and the A40 runs along the north-eastern boundary. The Afon Tarell flows approximately north-east along the south-eastern boundary of the site. On the opposite side of the river in Ffrwydgrech Estate, is Powys County Council highways depot and the British Wool Depot. Across the A470 is Brecon Enterprise Park. It is located within Brecon Beacons National Park.
- 2.2. Within the proposed 1km study area there is one Registered Park and Garden and Kitchen Garden located to the south-west of the Site known as Ffrwdgrech Estate. The Registered Historic Landscape (RHL) for Middle Usk Valley: Brecon and Llangorse boundary does lie partially within the north-east of the Site, however the character area for Brecon (HLCA 1172) defines its boundary as the A40 and therefore is not within the Site. Section 7.0 (especially section 7.4) of *A Guide to Good Practice on Using the Register of Landscapes in the Planning and Development Process*

(CADW 2007) explains the process of determining edges to the RHL. It acknowledges that sometimes there are discrepancies between the RHL boundary and the HLCA boundaries as the latter were created on more detailed mapping. It notes how both designations are non-statutory and that it is a decision for the planning authority to define its edges in relation to EIA or Planning Inquiry. The decision has been made that the HLCA boundary will be considered correct here, leaving the Site outside of the RHL. Please see the consultation section for more details.

- 2.3. There are 48 Listed Buildings within the study area including one Grade I Listed Building, one Grade II* Listed Building, and 46 Grade II Listed Buildings. These are primarily associated with the settlement core of Llanfaes to the east of the Site, Newton Farm to the north-east of the Site, and Ffrwdgrech Estate to the south of the Site.

Consultation

- 2.4. A pre-application enquiry has been submitted under reference 26/24544/PAYPRE, in reference to 'written advice and meeting and specialist advice re erection of a Class A1 retail foodstore with surface level car parking, landscaping, and all associated drainage and engineering operations and service connections'. A response from Senior Planning Officer Christopher O'Brien for Brecon Beans National Park Authority (BBNPA) was received on the 23rd June 2026. The following advice related to heritage and archaeology is listed here:

1. *We also suggest an Environmental Impact Assessment Screening Opinion is sought prior to any application being submitted.*
2. *Any forthcoming application for development of the site should be supported by submission of copies of any archaeological assessment and evaluation works undertaken at the site, to provide an evidence base to support determination of the application.*
3. *Should an initial assessment indicate it necessary, you may also wish to avoid a potential condition by submitting a Written Scheme of Investigation (WSI), securing the implementation of a programme of archaeological work as part of the application.*

- 2.5. Subsequent consultation has taken place with planning archaeologists at Cadw, Heneb, and the Bannau Brycheiniog National Park Authority (BBNPA).

-
- 2.6. Alice Thorne, the Archaeological Advisor to the Planning Department for BBNPA was contacted on the 28th July 2026 regarding the forthcoming WSI, and has confirmed on the 29th July 2026 that she will review this WSI.
- 2.7. Consultation was undertaken with Heneb on the 27th July 2026 regarding the possibility of an ASIDOHL requirement. Neil Bayliss of Heneb recommended on the 31st July that although the RHL is within the Site, at the present stage an ASIDHOL requirement is unlikely to be triggered based on the height of surrounding vegetation and built form, however, this is dependent upon the height of the proposed buildings and will be confirmed at a later stage once the building plans have been finalised.
- 2.8. Nail Maylan of Cadw was contacted on the 27th July 2026 for comment on the potential for an ASIDHOL and/or EIA requirement, and has confirmed on the 28th July 2026 that the ASIDHOL is unlikely to show development in the area as a significant impact, and that at the current stage an EIA is likely not required. If the EIA is required, CADW will be consulted. He also confirmed that the map of the HCLA 1172 shows the boundary of the RHL as the A470, outside of the Site and to consult Section 7 of *A Guide to Good Practice on Using the Register of Landscapes in the Planning and Development Process* when determining the edges of the RHL.
- 2.9. Nail Maylan also responded to consultation on the draft WSI on the 7th August 2026, requesting that the study area for setting to be 3km. He subsequently confirmed on the 17th August 2026 that this would include an assessment of settings for all Designated Heritage Assets within 3km of the Site.
- 2.10. As such, both and ASIDOHL, and heritage input into any EIA, are unlikely to be required for the forthcoming application, however appropriate consultation will continue to confirm these once further information is available. An EIA Screening Opinion will be requested by the developer. The HCLA is not within the Site boundary, and consultees have commented that the proposal is unlikely to impact the RHL, and that ASIDOHL is unlikely to be required unless building heights are above surrounding vegetation and built form, which will be confirmed at a later date.



 Site



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PROJECT TITLE
Land To North of Brecon Ind. Est., South of
A40/A470 Roundabout, Brecon

FIGURE TITLE
Site Location Plan

0 1 km

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Survey AC0000808122

DRAWN BY HB **PROJECT NO.** CR2288
CHECKED BY ZA **DATE** 04/08/2026
APPROVED BY ZA **SCALE @ A4** 1:25,000

FIGURE NO.

1

3. OBJECTIVES

3.1. The assessment will fully assess the known and potential historic assets within the Site, their survival and significance. The objectives of the desk-based assessment will be:

- to identify any archaeological remains within and in proximity to the Site and will attempt to determine, where possible based on the information available, the significance of any such assets
- to identify designated historic constraints within the Site and study area;
- to gather information on non-designated recorded historic assets through desk-based research, and through available archaeological survey information;
- to assess the above baseline information, and offer an analysis of the potential for currently unrecorded historic assets within the Site;
- to assess, as far as possible, the likely depth and extent of any below-ground archaeological deposits within the Site; and
- to determine whether the proposed development has the potential to change the settings of the designated historic assets to such a degree that it would impact upon the significance of the historic assets.
- a consideration of recommendations for future archaeological investigation or mitigation measures

4. METHODOLOGY

Key Heritage Policy and Guidance

4.1. The content, aims and method set out in this WSI have been guided by the following key documents:

- Planning Policy Wales (Welsh Government Edition 12, 2024);
- Technical Advice Note (TAN) 24: The Historic Environment (Welsh Government 2026);
- Conservation Principles (Cadw 2011);
- Brecon Beacons National Park Local Development Plan (2007 – 2022)
- Draft Delivery Agreement for the Bannau Brycheiniog (Brecon Beacons) National Park Local Development Plan 2025 – 2045 (currently in consultation)

period with the National Park Authority before submission to the Welsh government for agreement)

- Standard and guidance for historic environment desk-based assessment (ClfA 2020a);
- Setting of Historic Assets in Wales (2025);
- Research Framework for the Archaeology of Wales; and
- The 'Guidance for the Submission of data to the Welsh Historic Environment Records' produced by the Welsh Archaeological Trusts (2022)

Desk-Based Assessment

4.2. The desk-based research and sources will be based upon the *Standard and Guidance for historic environment assessments* produced by the Chartered Institute for Archaeologists (ClfA 2020a). Cotswold Archaeology is a Registered Organisation with the ClfA, and the project will be managed and technically coordinated by a Member of the Institute.

4.3. The archaeological assessment will utilise a minimum study area of 1km around the boundary of the proposed Site. Data will be collated from published and archive sources of archaeological, historical, geographical, topographical, and environmental information relevant to the area of the development using the following sources:

- Cadw and RCAHMW for details of designated historic assets, e.g., Scheduled Monuments, Listed Buildings and Registered Parks and Gardens;
- The Heneb Historic Environment Record (HER) for details of previously completed archaeological works in the vicinity and recorded historic assets;
- Aerial photographs curated by the Central Register of Aerial Photographs for Wales;
- The Powys Archives, for documentary sources and historic mapping of relevance to the historical development of the Site and its surroundings;
- Remote sensing resources, i.e., LiDAR (provided by Natural Resources Wales);
- Relevant national and local planning policy documentation; and
- A walkover survey of the proposed Site and its environs to assess and document any extant evidence of historic assets, any evidence of previous disturbance within the area of the Site and the setting of historic assets.

Value of historic assets

- 4.4. The value of historic assets is best defined by the Cadw guidance, *Conservation Principles* (2011), which describes value as a combination of evidential value; historical value; aesthetic value; and communal value.
- 4.5. Evidential value derives from those elements of an historic asset that can provide evidence about past human activity, including its physical remains or historic fabric.
- 4.6. Historical value may derive from particular aspects of past ways of life, or association with notable families, persons, events or movements – it embodies the connection between past events and society with the present.
- 4.7. Aesthetic value derives from the sensory and intellectual stimulation drawn from an historic asset. It may include its physical form, and how it lies within its setting. It may also be the result of design, or an unplanned outcome of a process of events.
- 4.8. Communal value derives from the meanings that an historic asset has for the people who relate to it, or for whom it figures in their collective experience or memory. It may be commemorative or symbolic and relate to issues of identity or collective memory.

The setting of historic assets

- 4.9. The assessment will be undertaken in accordance with the approach outlined in Cadw's 'Setting of Historic Assets in Wales' (2025). This publication provides guidance on setting and development management, including the assessment of the implications of proposed development. It reiterates that 'the setting of a historic asset is the surroundings in which a historic asset is experienced. 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'. In accordance with the guidance, the extent of the setting of a historic asset is not fixed and can evolve periodically.
- 4.10. All historic assets have a setting, and features of a setting may make a positive or negative contribution to significance and may affect the appreciation of the asset. They can remain neutral. The extent and importance of setting is often expressed by reference to visual considerations but can also comprise other elements which contribute to the ways in which a historic asset is experienced, including factors such as noise, vibrations, dust, or other pollutants; spatial associations; the rarity of

comparable survivals of setting, and associative relationships between historic assets.

Study area

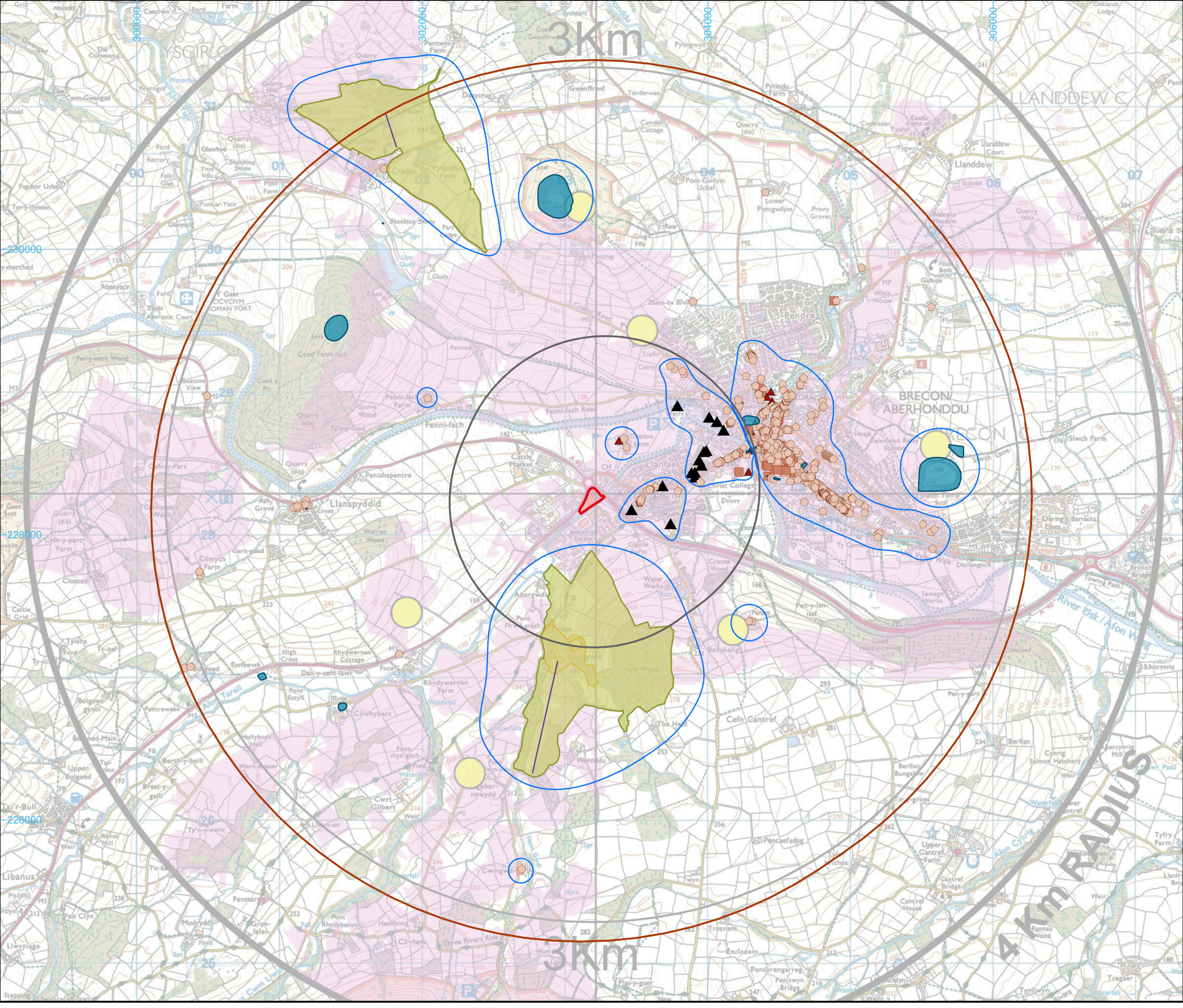
- 4.11. An appropriate 'study area' will be utilised for the stepped assessment of settings. Following consultation with Cadw, a 3km 'buffer' study area around the development area will be consideration of potential effects upon the 'setting' of historic assets. Those assets beyond 1km of the site boundary which are not intervisible with the Site (based on the ZTV provided by the client) and are outside of the town centre of Brecon will be scoped out from the settings assessment. Those scoped in will be assessed in the groups shown on Fig 2.

5. STAFF AND TIMETABLE

- 5.1. This project will be under the management of Zoe Arkley, Senior Heritage Consultant, Cotswold Archaeology. The assessment will be undertaken, and the subsequent report produced by Hannah Burke, Heritage Consultant. The data collation, analysis and assessment report normally takes approximately six weeks.

6. ANALYSIS AND REPORTING

- 6.1. The information collated will initially be assembled into a workable database, cross-referenced to the original sources. The assessment report will begin with a non-technical summary both in English and Welsh, in accordance with *Guidance for the Submission of Data to the Welsh Historic Environment Records* (WAT 2022), outlining in plain language the principal reasons for the work, its aims and main results. The introduction will then set out the circumstances leading to the commission of the report, any restrictions on reporting or access to relevant records, size, surface geology and topography of the study area. Any variation from the methodologies set out in this project specification will be detailed and explained within the methodology section of the report.
- 6.2. The report will set out the information base regarding the assessment objectives, as set out in Section 3 above. The known and potential historic assets will be outlined clearly and objectively in relation to the methods used, organised by archaeological period or type, and with reference to, or inclusion of, supporting evidence. The results will be interpreted and put into context in terms of significance. A comprehensive list of sources consulted, with full bibliographic details, will be provided at the back of the report.



Site

Settings assessment groups

1km study area

3km study area

Scheduled Monument

Registered Park and Garden

Registered Kitchen Garden / Garden

Significant Views

Grade I Listed Building

Grade II* Listed Building

Grade II Listed Building

0

1,000m

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PROJECT TITLE

Land To North of Brecon Ind. Est., South of A40/A470 Roundabout, Brecon

FIGURE TITLE

Designated Heritage Assets, Locally Listed Buildings and ZTV

DRAWN BY

HB

CHECKED BY

JS

APPROVED BY

ZA

PROJECT NO

CR2288

DATE

19/08/2026

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FIGURE NO.

2

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- 6.3. The assessment will be supported with illustrative material, including at least one figure showing known or potential historic assets within or affecting the proposed scheme. Where possible, areas of greater or lesser potential will be defined and the effects of previous construction, industrial and other intrusive activity taken into account.

Detailed Scope of Report Contents

- 6.4. The report will contain the following information:
- Bilingual non-technical summary
 - Introduction
 - Planning background, including aims and objectives
 - Description of proposed development
 - Methodology
 - Site topography and geology
 - Archaeological and historic background and context (including information from cartographic and aerial photographic sources, and the Site inspection)
 - Assessment of effects (physical and non-physical)
 - Preliminary recommendations for work
 - Conclusions
 - References and bibliography
 - Data Management Plan and archive selection strategy (included as Appendices)

Archive deposition

- 6.5. The final archive (Site and research) will, whenever appropriate, be deposited with a suitable receiving institution, usually the relevant Local Authority museums service. Arrangements will be made with the receiving institution before work starts. A digital copy of the archive will also be sent to the RCAHMW following the guidance set out in the 'RCAHMW Guidelines for Digital Archives' (2015).
- 6.6. Copies of the assessment report will be deposited with the National Monuments Record, RCAHMW, Aberystwyth. Wherever the archive is deposited, this information will be relayed to the HER. This will be in line with the guidance published by National Panel for Archaeological Archives in Wales (NPAAW), *National Standard and Guidance to Best Practice for Collecting and Depositing Archaeological Archives in Wales* (2017). Unless confidential, the digital archive will also be supplied to Heneb

within 6 months of project completion, or within a timeframe previously agreed with HER staff in accordance with *Guidance for the Submission of Data to the Heneb Historic Environment Record (HER)* (2024).

Data management

- 6.7. All digital data will follow strict file naming, to include the unique project code, and be sorted into a standard series of sub-folders. The digital data will be catalogued, including a list of file types and relevant software.

7. HEALTH AND SAFETY

- 7.1. CA will conduct all works in accordance with the Health and Safety at Work Act 1974 and all subsequent Health and Safety legislation, and CA Health, Safety and Welfare Policy (2010).

8. INSURANCES

- 8.1. CA holds Public Liability Insurance to a limit of £15,000,000 and Professional Indemnity Insurance to a limit of £10,000,000.

9. QUALITY ASSURANCE

- 9.1. CA is a Registered Organisation (RO) with the Institute for Archaeologists (RO Ref. No. 8). As a RO, CA endorses the Code of Conduct (ClfA 2019) and adheres to the Standard and Guidance for Commissioning Work or Providing Consultancy Advice on Archaeology and the Historic Environment (2020b). All CA Project Managers and Project Officers hold either full Member or Associate status within the ClfA.
- 9.2. CA operates an internal quality assurance system in the following manner. Projects are overseen by a Project Manager who is responsible for the quality of the project. The Project Manager reports to the Chief Executive who bears ultimate responsibility for the conduct of all CA operations. Matters of policy and corporate strategy are determined by the Board of Directors, and in cases of dispute recourse may be made to the Chair of the Board.

10. REFERENCES

Bannau Brycheiniog (Brecon Beacons) National Park 2013 *Brecon Beacons National Park Local Development Plan (2007 – 2022)*

Bannau Brycheiniog (Brecon Beacons) National Park 2025 *Draft Delivery Agreement for the Bannau Brycheiniog (Brecon Beacons) National Park Local Development Plan 2025 – 2045*

CADW 2007 *A Guide to Good Practice on Using the Register of Landscapes in the Planning and Development Process*

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

Cadw 2025 *Setting of Historic Assets in Wales*

Chartered Institute for Archaeologists 2020a *Standard and Guidance for Historic Environment Desk-Based Assessment.*

Chartered Institute for Archaeologists **2020b** *Standard and Guidance for Commissioning Work or Providing Consultancy Advice on Archaeology and the Historic Environment*

Heneb 2024 *Guidance for the Submission of Data to the Heneb Historic Environment Record (HER)*

National Panel for Archaeological Archives in Wales 2017 *National Standard and Guidance to Best Practice for Collecting and Depositing Archaeological Archives in Wales*

RCAHMW 2015 *RCAHMW Guidelines for Digital Archives*

Research Framework for the Archaeology of Wales
<https://www.archaeoleg.org.uk/intro.html>

Welsh Government 2024 *Planning Policy Wales, Edition 12*

Welsh Archaeological Trusts 2022 *Guidance for the Submission of Data to the Welsh Historic Environment Records (HERs)*

Welsh Government 2026 *Technical Advice Note (TAN) 24: The Historic Environment*

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