

██████████
City & County of Swansea

By email

Eich cyfeirnod
Your reference

Ein cyfeirnod
Our reference

Dyddiad
Date

Llinell uniongyrchol
Direct line

Ebost
Email:

GM501

5 January 2024

0300 025 6004

scheduledmonuments@gov.wales

Dear ██████████,

**ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979
APPLICATION FOR SCHEDULED MONUMENT CONSENT
MELIN MYNACH, GORSEINON (GM501)**

1. Introduction

1.1 Thank you for your application of 31 October 2023 to Cadw for scheduled monument consent for repair and improvement measures to the remains of the Woollen Factory and Paper Mill at the above scheduled monument.

1.2 Cadw is a Department within the Welsh Government that undertakes the statutory functions of the Welsh Ministers in determining applications for scheduled monument consent.

1.3 Each application for scheduled monument consent is considered on its own merits in accordance with *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* ([Conservation Principles](#)) and Annex A of *Technical Advice Note 24: The Historic Environment (TAN 24)*. In particular, TAN 24 explains that the main purpose of scheduling is to ensure the preservation of ancient monuments and, when considering an application for scheduled monument consent, there is a presumption against proposals which would involve significant alteration or cause damage or which would have a significant impact on the setting of remains.

2 Assessment

2.1. Your application and supporting documentation has been assessed by our Regional Inspector of Ancient Monuments who has recommended that conditional scheduled monument consent should be approved. The reasons for the Inspector's conclusions are set out in **Annex A** of this letter.

2.2. I have carefully considered the impact of the proposed development on the scheduled monument and its setting in light of the advice that I have received from our Regional Inspector of Ancient Monuments. I have no reason to disagree with the

advice of our Regional Inspector and am satisfied that his recommendation is consistent with the objectives of Conservation Principles and TAN 24.

3. Decision

3.1. Accordingly, I hereby approve conditional scheduled monument consent for the proposed works as outlined in section 1.1.

3.2. In reaching this decision, I have taken into account the requirement of sections 3 and 5 of the Wellbeing of Future Generations Act. I consider that this decision is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of *A Wales of vibrant culture and thriving Welsh Language*.

3.3. Any development control issues associated with wider development will be a matter for any application for planning permission. It is the responsibility of the applicant to establish whether any further approval or consents are required for the proposed development.

4. Conditions

4.1. The following conditions are intended to protect the monument from damage or significant alteration as set out in TAN 24: *The Historic Environment* and to ensure that details of the project are archived.

- a) The applicant shall provide Cadw with reasonable advance notice of commencement of works on site and will afford access at all reasonable times to any Cadw official or archaeologist nominated by Cadw to monitor progress of the works;
- b) The approved works shall be carried out strictly in accordance with the application form, plans and documents as listed below. No variations are permitted unless they have been authorised in advance in writing by Cadw;

Number	Document / plan	Reference Number (if applicable)	Date
1	SMC application form signed by Thomas Martin 31/10/23		31/10/23
2	Structural Appraisal Report of Woolen Factory and Paper Mill	11159_R_TM_01_P1	Oct 2022
3	Proposed Plan	11159_101_P2	13/10/23
4	Heritage Impact Assessment	11159_HIA_BJ_01	Oct 2023
5	NW & SE Facing Elevation of NW Wall	1105_11_03_22_1	11/03/2022
6	NW & SE Facing Elevation of SE Wall	1105_11_03_22_2	11/03/2022
7	Orthomosaic Plan	1105_11_03_22_5	11/03/2022

c) The approved works shall be carried out strictly in accordance with a 'Method Statement' to be submitted in advance and formally approved in writing by Cadw before work commences. The 'Method Statement' shall be adhered to throughout the project and any variations shall be approved by Cadw prior to works commencing;

d) The Method Statement shall provide for:

	INFORMATION REQUIRED	Date when information required
1	Removal of date stone to secure storage – including location of stone.	Before work commences.
2	Storage of loose stone in locked gabion baskets, including proposed location and details of future monitoring and recording.	Before work commences.
3	Removal of vegetation.	Before work commences.
	Rebuilding areas of disturbed / missing masonry.	Before work commences.
4	Details of new materials to be used including samples of replacement stone if required.	Before work commences.
5	Lime mortar specification.	Before work commences.
6	Erection and removal of access scaffolding if required.	Before work commences.
7	Cleaning and repainting waterwheel and existing edge protection, including materials proposed.	Before work commences.
8	Excavation of 125mm depth within internal area of mill and installation of 150mm depth of 60mm size stone bulk fill over geotextile membrane.	Before work commences.
9	Additional edge protection and fencing, including design, materials, colour, and installation.	Before work commences.
10	Arrangements for vehicle movement to minimise ground disturbance.	Before work commences.

e) No works, including site clearance, shall commence until Cadw has been informed in writing of the name of an appropriately qualified archaeologist operating to ClfA published standards and guidance¹ who is to be present to undertake a watching brief during excavation and infilling work within the Mill in accordance with a written scheme of investigation which has been submitted to, and approved in writing by, Cadw. No work shall commence until Cadw has confirmed in writing that the proposed archaeologist and WSI;

¹ Chartered Institute for Archaeologists <https://www.archaeologists.net/codes/cifa> .

- f) A digital copy of the draft watching brief report shall be submitted to Cadw for approval within 8 weeks of the archaeological fieldwork being completed²;
- g) A digital copy of the approved watching brief report shall be submitted to the regional Historic Environment Record and National Monuments Record of Wales to be incorporated into these public records³, and the applicant shall inform Cadw when this has been completed;
- h) Cadw shall be invited to attend a site meeting within the first 5 working days of commencement of the project to review the programme, submitted method statement, mortar mix and arrangements that have been established for archaeological mitigation;
- i) That Cadw's Inspector is to approve a trial panel of mortar mix, rebuilding and pointing before full work is undertaken;
- j) That upon completion of the project the applicant shall produce a completion report including an annotated photographic record detailing the site before, during and after works took place and including final versions of plans and elevations as built. The draft should be sent to Cadw in digital format for approval within 25 working days of the works being completed; and
- k) Any historic or archaeological features not previously identified which are revealed when carrying out the works shall be retained *in situ* and reported to Cadw within two working days. Works shall be halted in the area/part of the site affected until provision has been made for retention and/or recording of the feature by a suitably qualified archaeologist in accordance with details submitted to and approved in writing in advance by Cadw.

5. Compliance

5.1. Where a condition requires approval or any contact with Cadw you are advised to contact [REDACTED] by email scheduledmonuments@gov.wales or by telephone on [REDACTED].

5.2. When all work has been completed and the conditions have been discharged, please complete and return the 'completion notice' at **Annex B** to Cadw. Section 2(6) of the 1979 Act provides that non-compliance with a condition attached to a grant of scheduled monument consent shall be an offence.

5.3. By virtue of Section 4 of the 1979 Act, if no works to which this consent relates are executed or started within 5 years from the date of this letter, the consent shall cease to have effect at the end of that period (unless it is revoked in the meantime).

² Cadw will retain a copy of the watching brief report for our records.

³ Cadw requires formal confirmation of report deposit to discharge condition.

5.4. This letter does not convey any approval or consent required under any enactment, bylaw, order or regulation other than Section 2 of the Ancient Monuments and Archaeological Areas Act 1979. It is the responsibility of the applicant to obtain any such approval or consent where necessary.

6. Mechanism for Challenge

6.1 Section 55 of the 1979 Act explains that if you are aggrieved by the decision given in this letter, you may challenge its validity by applying to the High Court within six weeks from the date of my decision. Furthermore, the legislation explains that the grounds on which an application may be made to the Court are;

- a) that my decision is not within the powers of the Act (i.e. that I have exceeded the powers available under the Act); and
- b) that any of the relevant requirements set out in the Act have not been complied with and that your interest has been substantially prejudiced by the failure to comply.

The 'relevant requirements' mentioned above are defined in Section 55 of the 1979 Act and it is advisable to seek legal advice before taking any action.

6.2. Should you have any queries please do not hesitate to contact me.

6.3 Finally, please note that your personal data is managed in compliance with the [General Data Protection Regulations](#).

Yours sincerely,



Casework Manager
under authority of the Deputy Minister for Arts, Sport and Tourism, one of the Welsh Ministers

Annex A

ANCIENT MONUMENTS AND ARCHAEOLOGICAL AREAS ACT 1979 APPLICATION FOR SCHEDULED MONUMENT CONSENT MELIN MYNACH, GORSEINON (GM501)

INSPECTOR'S ADVICE

1. Policy Context

- 1.1 An application for scheduled monument consent (SMC) is considered on its own merits in accordance with *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* ([Conservation Principles](#)) and Annex A of *Technical Advice Note 24: [The Historic Environment \(TAN 24\)](#)*. In particular, TAN 24 explains that the main purpose of scheduling is to ensure the preservation of ancient monuments and, when considering an application for SMC, there is a presumption against proposals which would involve significant alteration or cause damage, or which would have a significant impact on the setting of remains. Therefore, applicants are expected to demonstrate that no practicable alternative route or location, avoiding the scheduled area, exists and that the need to undertake works outweighs the presumption in favour of the protection of the scheduled monument.
- 1.2 The Welsh Government's six principles for sustainable management of the historic environment in Wales are also used as a guide when considering applications for scheduled monument consent. These are:
- Historic assets will be managed to sustain their values.
 - Understanding the significance of historic assets is vital.
 - The historic environment is a shared resource.
 - Everyone will be able to participate in sustaining the historic environment.
 - Decisions about change must be reasonable, transparent and consistent.
 - Documenting and learning from decisions is essential.

2. Melyn Mynach, Gorseinon.

- 2.1 The following provides a general description of the Scheduled Ancient Monument.

The monument consists of the remains of a watermill. Water power has been used at this location for various industrial purposes for a long period. The earliest mill is thought to be of monastic origin, possibly built after Neath Abbey took over the estate of Cwrt-y-carnau in 1150 and was probably a corn mill. The first documentary reference to a mill was in 1578. In 1772 it was converted for paper making and was one of the first of its kind in Wales, in use for over a century. It was returned to use as a corn mill in the 1830's, but in 1866 William Lewis converted the mill to woollen manufacture, enlarging it substantially in 1874. From 1888 the site was turned to chemical and tinplate manufacturing,

and the mill itself became disused. The main surviving features are the leat, pond, paper mill, woollen mill, two wheel pits, dye-houses and the mill owner's house.

The monument is of national importance for its potential to enhance our knowledge of water management systems and industrial practices. It retains significant archaeological potential, with a strong probability of the presence of associated archaeological features and deposits. The structure itself may be expected to contain archaeological information concerning chronology and building techniques.

The scheduled area comprises the remains described and areas around them within which related evidence may be expected to survive.

2.2 Prior to scheduling in 1991 the sites was subject to a programme of archaeological excavation and recording, and consolidation.

2.3 The most recent Cadw Monuments at Risk monitoring visit was undertaken on October 18th, 2021, at which time the MaR level was recorded as High Immediate for numerous reasons, including vandalism, vegetation growth on masonry, damage to masonry, and dumping of litter.

2.4 The key values of the monument are summarise below:

Evidential value:

Complex site comprised of standing and buried remains demonstrating water management and the application of water power to drive a variety of industrial processes potentially ranging from mid-12th century monastic use until finally abandoned in the first decade of the 20th century.

Historic Value:

Well-documented including newspaper articles, GGAT and Black Mountain Archaeology reports.

Aesthetic Value:

The substantial ruins provide a tangible link to food production, paper-making, wool processing, and the manufacture of chemicals and tinplate, supporting the local community and industry contributing to the area's industrial dominance in the 18th and 19th centuries. Well preserved structures can be viewed at the site.

Communal Value:

Melyn Mynach is maintained by Swansea City Council within a park open to the public with support from the Friends of Melin Mynach. The monument is popular and well visited but has unfortunately been subject to repeated incidents of anti-social behaviour and vandalism.

3. The Application

3.1 This application for scheduled monument consent involves (i) litter pick, (ii) removal of date stone to safe storage off site and storage of loose stone to gabion baskets located on site, (iii) remove vegetation from walls, rebuild areas of disturbed / missing masonry, and consolidation of wall heads in areas where records exist of previous form, (iv) clean and repaint waterwheel and existing edge protection, (v) excavation of 125mm depth within internal area of mill and

installation of 150mm depth of 60mm size stone bulk fill over geotextile membrane, and (vi) installation of additional edge protection and fencing.

4. Assessment

- 4.1 The application is supported by detailed information including a structural appraisal report, heritage impact assessment, drawing showing proposed works, and survey drawings.
- 4.2 The structure appraisal provides a thorough assessment of defects and ongoing issues at the monument, which have previously been identified during Cadw monitoring visits and reported to Cadw by concerned members of the public. The appraisal also considers H&S risks and proposed measures to enable safe access.
- 4.3 Item (i) litter pick does not require SMC. Items (ii) – (vi) require SMC.
- 4.4 Item (ii) removal of date stone to safe storage off site and storage of loose stone to gabion baskets located on site is required to prevent loss of the date stone and prevent disturbed masonry stone from being lost from site or used to damage other parts of the monument. Removal of the date stone to safe storage is acceptable to prevent its theft from site. Safe storage can be included as a condition of SMC to avoid inadvertent loss.
- 4.5 Item (iii) remove vegetation from walls, rebuild areas of disturbed / missing masonry, and consolidation of wall heads in areas where records exist of previous form. The proposed works will have a significant beneficial impact on the physical (evidential) remains of the monument by restoring masonry to known forms lost since conservation works were undertaken in the 1990s. The proposed works will prevent further loss of historic fabric. The work will enhance the appearance and understanding and interpretation of the monument (aesthetic values). Communal values will be enhanced by stabilising the remains and making them safe.
- 4.6 Item (vi) clean and repaint waterwheel and existing edge protection. These are maintenance works to previously conserved structure and modern additions and will enhance their preservation and appearance. Negative impacts can be avoided by conditioning the consent for provision of a method statement.
- 4.7 Item (v) excavation of 125mm depth within internal area of mill and installation of 150mm depth of 60mm size stone bulk fill over geotextile membrane. Though the area has previously been subject to investigation and conservation works there is a risk that excavation could damage physical remains of the monument. However, the depth excavated is minimal and negative impacts can be prevented by conditioning the consent for a watching brief to be undertaken during excavation and infilling, for a stop clause, and for a method statement for excavation and infilling.
- 4.8 Item (vi) installation of additional edge protection and fencing. The work will introduce modern fabric into the site, potentially affecting its appearance.

Maintaining a ‘house-style’ in keeping with similar interventions on site will reduce their impact. The works have potential to cause negative impacts to historic remains during their installation, though these impacts are likely to be localised. These works are required for H&S reasons to enable safe access and reduce risks, thus enhancing communal value. Potential impacts to evidential and aesthetic values can be reduced by attaching a condition to the SMC for provision of a method statement regarding these elements.

5. Recommendation

- 5.1 I recommend that scheduled monument consent is given, subject to the following conditions:

6. Proposed Conditions

- 6.1 The applicant shall provide Cadw with reasonable advance notice of commencement of works on site and will afford access at all reasonable times to any Cadw official or archaeologist nominated by Cadw to monitor progress of the works.
- 6.2 The approved works shall be carried out strictly in accordance with the application form, plans and documents as listed below. No variations are permitted unless they have been authorised in advance in writing by Cadw.

Number	Document / plan	Reference Number (if applicable)	Date
1	SMC application form signed by Thomas Martin 31/10/23		31/10/23
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6	NW & SE Facing Elevation of SE Wall	1105_11_03_22_2	11/03/2022
7	Orthomosaic Plan	1105_11_03_22_5	11/03/2022

- 6.3 The approved works shall be carried out strictly in accordance with a ‘Method Statement’ to be submitted in advance and formally approved in writing by Cadw before work commences. The ‘Method Statement’ shall be adhered to throughout the project and any variations shall be approved by Cadw prior to works commencing.
- 6.4 The Method Statement shall provide for:

	INFORMATION REQUIRED	Date when information required
1	Removal of date stone to secure storage – including location of stone.	Before work commences.
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	Rebuilding areas of disturbed / missing masonry.	Before work commences.
4	Details of new materials to be used including samples of replacement stone if required.	Before work commences.
5	Lime mortar specification.	Before work commences.
6	Erection and removal of access scaffolding if required.	Before work commences.
7	Cleaning and repainting waterwheel and existing edge protection, including materials proposed.	Before work commences.
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9	Additional edge protection and fencing, including design, materials, colour, and installation.	Before work commences.
10	Arrangements for vehicle movement to minimise ground disturbance.	Before work commences.

- 6.5 No works, including site clearance, shall commence until Cadw has been informed in writing of the name of an appropriately qualified archaeologist operating to ClfA published standards and guidance⁴ who is to be present to undertake a watching brief during excavation and infilling work within the Mill in accordance with a written scheme of investigation which has been submitted to, and approved in writing by, Cadw. No work shall commence until Cadw has confirmed in writing that the proposed archaeologist and WSI.
- 6.6 A digital copy of the draft watching brief report shall be submitted to Cadw for approval within 8 weeks of the archaeological fieldwork being completed⁵.
- 6.7 A digital copy of the approved watching brief report shall be submitted to the regional Historic Environment Record and National Monuments Record of

⁴ Chartered Institute for Archaeologists <https://www.archaeologists.net/codes/cifa> .

⁵ Cadw will retain a copy of the watching brief report for our records.

Wales to be incorporated into these public records⁶, and the applicant shall inform Cadw when this has been completed.

- 6.8 Cadw shall be invited to attend a site meeting within the first 5 working days of commencement of the project to review the programme, submitted method statement, mortar mix and arrangements that have been established for archaeological mitigation.
- 6.9 That Cadw's Inspector is to approve a trial panel of mortar mix, rebuilding and pointing before full work is undertaken.
- 6.10 That upon completion of the project the applicant will produce a completion report including an annotated photographic record detailing the site before, during and after works took place and including final versions of plans and elevations as built. The draft should be sent to Cadw in digital format for approval within 25 working days of the works being completed.
- 6.11 Any historic or archaeological features not previously identified which are revealed when carrying out the works shall be retained *in situ* and reported to Cadw within two working days. Works shall be halted in the area/part of the site affected until provision has been made for retention and/or recording of the feature by a suitably qualified archaeologist in accordance with details submitted to and approved in writing in advance by Cadw.

Name of Inspector: Louise Mees

Date: 15/12/2023

⁶ Cadw requires formal confirmation of report deposit to discharge condition.

COMPLETION NOTICE**Name of Monument: MELIN MYNACH, GORSEINON****Monument Number: GM501**

Conditions	Date	Signature
Start of works		
Method statement to Cadw		
Name of appropriately qualified archaeologist to Cadw and WSI		
Cadw approval of mortar mix		
Site meeting with Cadw		
Completion of works on site		
Submission of archaeological report(s) / Completion report to Cadw		

Applicant Name:

Signature:

When all work has been completed and the conditions have been discharged, please complete and return this completion notice to Cadw at scheduledmonuments@gov.wales