

# PROPOSED ASPHALT BATCHING PLANT - CELSA STEEL SITE, ROVER WAY, CARDIFF

**Heritage Assessment**

Prepared for: Harsco Metals Group Ltd

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## 1.0 Introduction

### 1.1 Planning background

This Heritage Assessment has been prepared by SLR Consulting Limited ('SLR') to support a full planning application by Harsco Metals Group Ltd (c/o Carter Jonas) for the construction of a proposed Asphalt Plant on land known as the Celsa Steel Site, Rover Way, Cardiff (**Appendix 1**). This piece of land stands south of the Celsa Steelworks and Rover Way, within the wider Celsa Steel Site.

The purpose of the Heritage Assessment is to identify the potential effects of the Proposed Development on the historic environment and cultural significance of the area. Based on the quality and quantity of designated heritage assets with a proscribed Study Area extending 2km around the Site, it is considered that archaeology and cultural heritage should be scoped-out of an Environmental Statement, although limited groundworks investigations would be required prior to any proposed development of the Site (see sub-section 1.2.3 below).

The approach adopted for archaeology and cultural heritage will follow a standard staged process consisting of baseline survey which will identify known and potential heritage assets. The field survey element (walkover survey) has not identified any extent or known buried archaeology within a 1km radius of the Proposed Development site. The walkover survey, along with information supplied by Glamorgan-Gwent Archaeological Trust's (GGAT) Historic Environment Record (HER), has identified eight listed buildings, a Scheduled Monument and a [registered] Historic Landscape within a 1-2km radius of the Proposed Development site. The Proposed Development area is on reclaimed land that has in the relatively past been used by several industries, including being the former site of Cardiff City Airport. The Site or the surrounding area is within any designated areas of heritage interest (i.e. a Conservation Area or World Heritage Site).

### 1.2 Legislative and Policy Background

#### 1.2.1 Legal Framework

The statutory protection for the setting of listed buildings is detailed in the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66 (1):

*"In considering whether to grant planning permission [or permission in principle] 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."*

#### 1.2.2 Planning Policy Wales<sup>1</sup>

Planning Policy Wales requires applicants to describe significance of any heritage assets affected by proposed development, including any positive or negative contribution made by their setting. Paragraph 6.1.29 outlines that:

*"Development plans should consider the inclusion of locally specific policies relevant to the historic environment. These must be distinctive and only cover those elements deemed as important"*

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<sup>1</sup> Published December 2018 (10<sup>th</sup> Edition).

*considerations from a local planning perspective.”*

### **1.2.3 Technical Advice Note (TAN 24): The Historic Environment**

In terms of [below-ground] archaeology, Technical Advice Note 24: The Historic Environment (and relevant to this report) makes the following statement at paragraph 4.2:

*“The conservation of archaeological remains is a material consideration in determining a planning application. When considering development proposals that affect scheduled monuments or other nationally important archaeological remains, there should be a presumption in favour of their physical preservation in situ, i.e. a presumption against proposals which would involve significant alteration or cause damage, or would have a significant adverse impact causing harm within the setting of the remains... In cases involving less significant archaeological remains, local 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.”*

## 2.0 Environmental Baseline and Potential Sources of Impact

### 2.1 Baseline Conditions

No Designated Historic Assets (DHAs) of national importance lie within the Proposed Development area (Site boundary) (**Figure 1**). Based on information supplied by GGAT's Historic Environment Record (HER), there are eight Listed Buildings, one Scheduled Monument (SAM) and the western boundary of the Gwent Levels Historic Landscape (alluvial wetlands) located within 2km of the Site. The eight Listed Buildings, all designated Grade II, are within the south-eastern side of Cardiff, immediately north of the Docklands Area.

The Site is located south of Rover Way, on reclaimed land (**Figure 2**). Based on historic mapping, the land on which the Site is located was formally marine mudflats (known as the Cardiff Flats). 19<sup>th</sup> century mapping clearly shows the SSW-NNE marshland coastline and the centre of the Site located 200m offshore within the mudflats. Mid- to late-20<sup>th</sup> century mapping shows the area reclaimed, part of which was used to construct Cardiff Airport (during the late 1930s)<sup>2</sup> and later the Rover Works over the airfield during the late 1950s. Between 1957 and 1967, historic map evidence shows evidence of land reclamation and the construction of 'slag heaps' over the Site. By 1967, the East Moors Steelworks had been erected, and a mineral railway and production sheds fed by a conveyor [belt] occupied the centre of the Site. Throughout the history of the steelworks, the centre of the Site was never fully developed, although a thick concrete mat with a substantial [historic] sub-base covered the Site. The East Moors Steelworks eventually ceased production in 1978. Steel production continued on-site with Allied Steel and Wire; however, this company went into receivership in 2002. The Site was bought by the Spanish firm Celsa in 2003 and continued steel production until 2007.

Based on the historic mapping and online sources, there are potentially a small number of non-designated historic assets of local importance present within a 2km buffer from the Site boundary (such as the aircraft hangars located off Seawall Road [**Plate 8**], the historic foreshore [**Plate 11**] and historic railway bridges on Splot Road [**Plate 12**]). To the east of the 2km buffer zone, and slightly encroaching it, is the designated Historic Landscape of the Gwent Levels<sup>3</sup>, whilst to the west of the Site is the 19<sup>th</sup> and 20<sup>th</sup> century docklands and townscape of Cardiff.

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<sup>2</sup> Alas known as Pengam Airport, the airfield was also used in World War II, but was closed in 1954. A number of hangars from this period still stand and would be regarded as NDHAs.

<sup>3</sup> The Gwent Levels Historic Landscape is of Outstanding Historic Interest in Wales, as cited in Part 2:1 of the Register of Landscapes, Parks and Gardens of Outstanding Historic Interest in Wales, 1998. The area (Ref. number HLW(Gt)2) includes the Gwent Levels Sites of Special Scientific Interest (various) and Redwick Conservation Area.

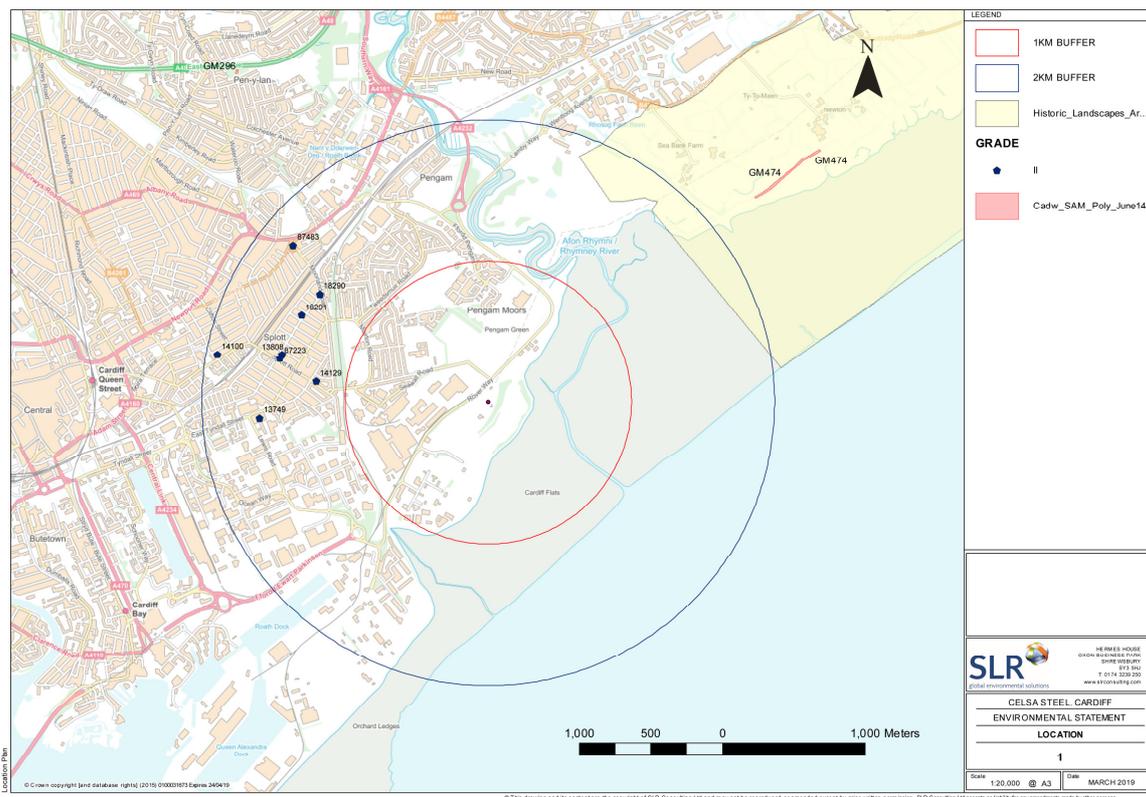


Figure 1: Location of all Designated Heritage Assets within the 2km Study Area

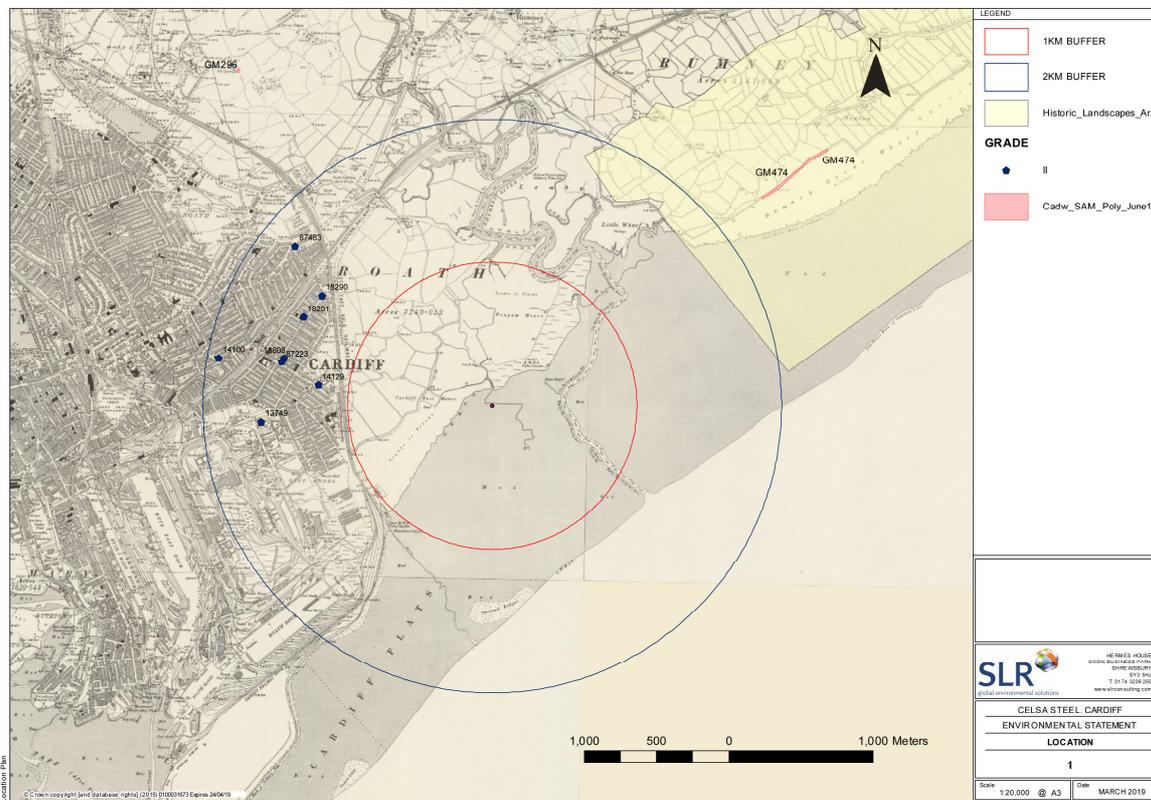


Figure 2: Early 20<sup>th</sup> century map showing the site and the field system to the north and the eastern boundary of Cardiff

## 2.2 Potential Sources of Impact

Potential effects on cultural heritage associated with the construction and/or operation of the Proposed Development may include:

- Direct impacts to below-ground archaeology through partial removal of the concrete pad during the groundworks phase – the depth of the anchor points may impact on known or currently undiscovered buried remains of archaeological interest; and
- Indirect effects may occur from the Proposed Development with the settings of Designated Heritage Assets, including those resulting from intervisibility between an asset and the Proposed Development; in particular, Listed Buildings located to the west of the Site, within the Cardiff parish of Splott, and the designated Historic Landscape that stands to the east of the Site.

### 3.0 Method of Assessment: Legislative, Policy and National Guidance Framework

The Proposed Development is one which requires Environmental Impact Assessment (EIA) under the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017; however, due to the quality, quantity and relative distance between the Proposed Development and the DHAs, this element can be scoped-out of an EIA. The assessment will comply with Welsh legislative and planning policy frameworks, and apply Cadw's relevant guidance, to ensure this assessment is undertaken in a robust manner, as follows:

- The Historic Environment (Wales) Act 2016 is the primary statutory tool for protecting historic assets and sustainable management of the historic environment. It is designed to enable greater transparency into decisions taken on the historic environment and to make it a statutory requirement for information on the historic environment to be safeguarded for the public good;
- National policy within Wales is set out in by Planning Policy Wales Edition 10, December 2018 ("PPW"), in which Chapter 6 Distinctive and Natural Places: The Historic Environment explains that: *Enabling development may be appropriate if the public benefit of rescuing, enhancing, or even endowing an important historic asset decisively outweighs the harm to other material interests. It must always be in proportion to the public benefit it offers.*
- PPW is supported by *Technical Advice Note 24: The Historic Environment* (May 2017) which is designed to assist local authorities with developing their Local Plans and for determination of planning applications or Listed Building consent in relation to historic assets. The Welsh Ministers and Planning Inspectors will consider these guidance documents when considering a proposal such as this;
- The two principal guidance documents that will be followed in this assessment are those produced by Cadw on behalf of the Welsh Government for managing historic assets: *Heritage Impact Assessment in Wales* (May 2017) and the *Setting of Historic Assets in Wales* (2017);
- Cadw's *Conservation Principles for the Sustainable Management of the Historic Environment in Wales* (March 2011) would also be used to establish objective assessment of the value and significance of historic assets within and surrounding the Proposed Development site;
- in relation to the Registered Landscape of Special Archaeological Interest in Wales, Natural Resources Wales (NRW)'s *Guide to Good Practice on Using the Register of Landscapes of Historic Interest in the Planning and Development Process* will be considered; and
- The Chartered Institute for Archaeologists' standard and guidance for Historic Environment Desk-based Assessment (January 2017) provides a national quality standard for the baseline study.

## 4.0 Baseline Desk Assessment

This cultural heritage assessment employs two Study Area zones. The Inner Study Area will comprise the Proposed Development and the area up to 1km from the centre of the Site (centred on NGR 321589.013 / 176383.759). Assessment of this area will include the south-eastern city boundary of Cardiff and the industrial development to the north of the Site. The 1km zone identifies no DHAs or archaeological/cultural heritage sites of significance. However, there are potentially sites present that can be classified as non-designated heritage assets (NDHA), including buildings associated with the former Cardiff City Airport. These NDHAs will not be affected by the Proposed Development, as the stand north of the Celsa Steel Works site are out of view from the Proposed Development (e.g. **Plates 9 and 10**, in Appendix 2).

Based on GGAT's HER, all DHAs are incorporated within the 1-2km buffer zone and include eight Listed Buildings, one Scheduled Monument and the western edge of a Registered Historic Landscape forming part of what is collectively known as the Gwent Levels (see **Figure 1**).

### 4.1 Baseline: Field Study

Following the preliminary process, the walkover survey was carried out over the area of the Proposed Development to establish the condition and setting of heritage assets and identify the potential for the existence of additional assets not currently identified. The walkover survey also identified elements of the contemporary landscape (including modern development and land-use) to help understand the setting of DHAs and the degree of change that the Proposed Development might introduce. All Listed Buildings located within the 1-2km zone of the Study Area stand within suburb of Splot. This area is mainly infilled with terraced housing developed during the mid- to late-19<sup>th</sup> century. Much of the terraced housing is designed using several distinct architectural styles and is supported by civic and commercial buildings of a similar age (e.g. **Plates 1 to 7**, in Appendix 2).

The following DHA sites/structures were identified:

- Rumney Great Wharf [seawall] (SM GM474)<sup>4</sup>
- Listed Building 14129 - St. Saviours Vicarage (incl. attached cottage to SE). **Plate 1**
- Listed Building 13808 - The Church of St. Saviour (dated 1887-8). **Plate 3**
- Listed Building 18291 - Church of St. Alban's On the Moors (constructed in 1911). **Plate 4**
- Listed Building 18290 - Moorlands Hotel (constructed in 1896). **Plate 5**
- Listed Building 13749 - The Maltings (industrial building, constructed in 1887). **Plate 6**
- Listed Building 14100 - Former St. German's Church School (Adamstown). **Plate 7**
- Listed Building 87223 - World War I war memorial (erected 1919-1921)
- Listed Building 87483 - Royal Oak, Adamstown (late 19<sup>th</sup> century)
- Historic Landscape - The Gwent Levels

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<sup>4</sup> The physical extent of this SM site is unknown.

Although the HER has revealed no sites within the 1km buffer zone, there are eight Listed Buildings and the eastern section of an Historic Landscape Area within the 2km buffer zone. The Historic Landscape Area – the Gwent Levels extends west towards the meandering course of the AfonRhymini (Rhydney River) and forms the eastern boundary of the 2km Study Area. East of the arbitrary line is the Cardiff Flats.

The Gwent Levels Historic Landscape is cited in Part 2:1 of the Register of Landscapes, Parks and Gardens of Outstanding Historic Interest in Wales (1998). The area (Ref. No. HLW(Gt)2) comprises three discrete and extensive areas of alluvial wetlands and intertidal mudflats situated on the north side of the Severn Estuary. The Gwent Levels is considered to be entirely the work of human agency, having been recurrently inundated and reclaimed from the sea from the Roman period to the modern age. Much of the area has distinctive settlement patterns, field enclosure and drainage that belongs to successive periods of use and landscape intensity. Incorporated into this landscape is a c. 560m section of an early post-medieval seawall defence known as Rhymini Wharf (GM 474). This visible structure dates to around 1591 and stands at a height of up to 3.2m and is around 6-7m in width. Based on archaeological evidence elsewhere along this designated area a large number of well-preserved, buried, waterlogged, archaeological and palaeoenvironmental sites surviving from at least the Mesolithic period (4 to 10 ka BCE). It is possible that a similar dispersal pattern may exist beneath the Proposed Development site.

## 5.0 Archaeological/Cultural Heritage Potential

To summarise the findings of this report and to broadly assess the potential for survival or presence of archaeological/cultural heritage assets, including DHAs, of the various chronological periods discussed above, the table below outlines known archaeological and historic evidence that stands within an arbitrary 2km Study Area:

**Table 1: Broad Assessment of Archaeological Potential**

Period	Evidence	Potential
Palaeolithic- Neolithic	Based on the various documentary sources, there is no evidence of early prehistoric activity within the area of the Proposed Development site or within the immediate vicinity. However, there could be sub-surface remains underlying the concrete pad that covers much of the Site.	Negligible to Low
Bronze Age - Iron Age	Based on the various documentary sources, there is no evidence of Bronze Age or Iron Age activity within the area of the Proposed Development site or within the immediate vicinity. However, there could be sub-surface remains underlying the concrete pad that covers much of the Site. It should be noted that extensive peat deposits extend along the Gwent Levels and are probably present underneath the surface of the Site.	Low
Romano-British	Based on the various documentary sources, there is no evidence of Romano-British activity within the area of the Proposed Development site or within the immediate vicinity. However, there could be sub-surface remains underlying the concrete pad that covers much of the Site. It should be noted that extensive peat deposits extend along the Gwent Levels and are probably present underneath the surface of the Site.	Low
Early Medieval	Based on the various documentary sources, there is no evidence of Early Medieval/Celtic activity within the curtilage of the Site or the surrounding landscape.	Negligible to Low
Medieval	Based on the various sources, there is no evidence of medieval activity within the boundary of the Proposed Development site. However, according to the historic mapping, an extensive historic field system once existed to the north of the Site, beyond the area that was reclaimed during the 20 <sup>th</sup> century and where the centre of the Proposed Development site is located.	Low
Post-Medieval	Based on the various sources, there is no evidence of post-medieval activity within the boundary of the Proposed Development site. However, according to the historic mapping, an extensive historic field system once existed to the north of the Site, beyond the area that was reclaimed during the 20 <sup>th</sup> century and where the centre of the Proposed Development site is located.	Negligible to Low
Conservation Areas	The Proposed Development site or land within the 2km buffer zone does not stand within a Conservation Area.	N/A

Period	Evidence	Potential
Listed Buildings	There are 8 Listed Buildings that stand within the Study Area (between 1km and 2km radius of the Proposed Development site). All eight buildings are associated with the late 19 <sup>th</sup> century urban development and stand west of the Site within the suburb of Splot (see <b>Plates 1 to 7</b> ). There are no indirect impacts between these buildings and the Proposed Development.	Negligible
Locally Listed Buildings or buildings of local interest	There are no Locally Listed Buildings within the Study Area, although the walkover survey has identified the eastern suburb of Splot as possessing a large number of late 19 <sup>th</sup> century historic, mainly terraced dwellings and associated civic and amenity buildings. Based on the topography and the physical barriers between the eastern section of Splot and the Proposed Development site, there are no indirect impacts between these buildings and the Proposed Development.	Negligible
Scheduled Monuments	There is one Scheduled Monument located east of the 2km Study Area. This site (GM474) is a seawall that dates from 1591 and stands up to 3.2m in height. There is no indirect impact between this early post-medieval structure and the Proposed Development.	Negligible
Registered Historic Landscape	There is one registered Historic Landscape – The Gwent Levels, the western boundary of which extends into the western section of the 2km Study Area.	Negligible
Registered Battlefields	There are no Registered Battlefields within the boundary of the Site or the 2km Study Area.	N/A
World Heritage Sites	There are no World Heritage Sites within the Study Area.	N/A

## 5.1 Matters Scoped-Out

It is possible that, in terms of archaeology and cultural heritage, these can be scoped-out. This assumption is based on the distance and intervisibility between DHAs and the Proposed Development; all DHAs are within the 1km to 2km buffer zone and are not under any threat from indirect impacts from the Proposed Development.

In terms of direct impacts, a watching brief and palaeoenvironmental sampling strategy may be required in those areas where anchor points will be located. It is known that substantial peat deposits exist beneath the Site and the surrounding area. It is also known, based on the archaeological record elsewhere, that later prehistoric, Roman and medieval remains exist within and below certain peat layers (see **Table 1**).

## 6.0 Conclusions

DHAs within the Study Area comprise eight listed buildings (LB 1829, LB 18290, LB 13749, LB 13808, LB 14100, LB 14129, LB 87223 and LB 87483), one Scheduled Monument (GM474) and an Historic Landscape (Gwent Levels [HLW(Gt)2]). All Listed Buildings stand west of the Proposed Development site, within the late 19<sup>th</sup> century suburb of Splot, while the Scheduled Monument and Historic Landscape lie to the east. All designated heritage assets stand outside the 1km Study Area, but are within the 1-2km area (see **Figure 1**).

Based on the walkover survey, none of the designated heritage assets would be affected by the Proposed Development. The eight Listed Buildings are dispersed within the urban centre of Splot and are screened by neighbouring buildings and recent road infrastructure banking and landscaping which clearly separates the industrial area to the east from the urban centre of Splot. Similarly, the one Scheduled Monument – a late medieval/early post-medieval seawall and the Historic Landscape stand largely outside the 2km Study Area; each are screened (in part) by the natural topography and recent road infrastructure scheme (A4161 and A4323).

In summary, all designated heritage assets that stand within the 1km to 2km Study Area zone will not be affected by the Proposed Development and therefore the overall potential harm is considered be **Negligible**.

## APPENDIX 1

### Site Location



## APPENDIX 2

### Site Visit Photographic Log from April 2019

## Appendix 2: Site Visit Photographic Log from April 2019



**Plate 1. Listed Building 14129 – St Saviours Vicarage (incl. attached cottage to SE)**

**Plate 2. Former late 19th century bank located on the junction of Splot Road and Carlisle Road (unlisted)**



**Plate 3. Listed Building 13808 - The Church of St Saviour (dated 1887-8)**

**Plate 4. Listed Building 18291 - Church of St Alban's On the Moors (constructed in 1911)**



**Plate 5. Listed Building 18290 – Moorlands Hotel in Carlisle Road (constructed in 1896)**  
**Plate 6. Listed Building 13749 – The Maltings (industrial Building, constructed in 1887)**



**Plate 7. Listed Building 14100 - Former St German's Church School (Adamstown)**  
**Plate 8. General view of a section of Seawall Road and the industrial units either side**



**Plate 9. Mineral conveyor located immediately north of the Proposed Development site**  
**Plate 10. The Celsa Steelwork Complex from Rover Way**



**Plate 11. View of the coast fringe, south of the Proposed Development site**  
**Plate 12. Mid- to late-19th century railway bridges spanning across Splot Road**

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