Ellie Jones

From: Neil Bayliss <Neil.Bayliss@heneb.org.uk>
Sent: 02 January 2025 12:00
To: Alan Wells; planning
Subject: FAO: Alan Wells RE: P/2024/1515 at 2 Mill Lane Cottages, Horseman's Green
Attachments: Heneb Clwyd-Powys September 2024 - Level 3 HBR.pdf; Heneb Clwyd-Powys September 2024 - Registered Contractors.pdf

Good morning, Alan,

Regarding the consultation referenced above.

Information retained within the Regional Historic Environment Record indicates the proposed demolition of number 2 Mill Lane Cottages will remove a building shown on the Tithe Mapping of 1841. Images available for the building show clear indications of a timber framed structure and although modernised, the building is of least a local historical interest. In this case, we would recommend pre-determination evaluation which initially includes a **Level 3 Archaeological Building Recording** completed by a registered **Archaeological Contractor** of the dwelling to inform a decision on appropriate mitigation.

The proposed development will destroy any archaeological features within the building, but from present knowledge it is impossible to estimate how damaging this might be, and thus to frame an appropriate archaeological response. The planning authority appears to have insufficient information about this archaeological resource, or the applicant's intended treatment of it, to make a balanced decision. As archaeology is a material consideration here, I would advise that this application is not determined until this resource has been properly evaluated.

Welsh Government Planning Policy Wales (Edition 11, Feb 2021), TAN 24: the Historic Environment (May 2017) suggest that planning authorities should require applicants to supply a suitable archaeological assessment in support of an application where a potential impact to archaeological remains is identified. The specific guidance is stated in:

Planning Policy Wales (Feb 2021):

Paragraph 6.1.26

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.

This means that Local Planning Authorities in Wales must take into account archaeological considerations and deal with them from the beginning of the development control process and need to be fully informed about the nature and importance of archaeological remains, and their setting, and the likely impact of any proposed development upon them.

Technical Advice Note 24 (May 2017):

Paragraph 4.7.

'Where archaeological remains are known to exist, or considered likely to exist, and a study has not already been undertaken by the applicant, the local planning authority should ask an applicant to undertake a desk-

based archaeological assessment and, where appropriate, an archaeological evaluation. These should be done by a qualified and competent expert to the appropriate standard. The reports of these investigations will form part of the planning application. Applicants should show they have modified their development proposals to minimise any negative impact on the identified archaeological remains, and how they intend to mitigate any remaining negative impacts.'

The Level 3 survey would include a desk- based assessment to provide a building history, a detailed written descriptive survey of the present structures, measured survey of the buildings in plan and elevation, a detailed photographic survey, and phased plans of the building's development over time. All work will be completed in accordance with the relevant CIFA standards and guidance on evaluation and project archiving and reporting.

The developer will need to engage a CIfA **approved archaeological contractor** to complete this work in accordance with an approved **written scheme of investigation (WSI)** which will be supplied by the archaeological contractor and approved by us in advance of commencement of the investigation.

I would advise that in order to allow sufficient time for an evaluation to be carried out, and the discussion of a subsequent mitigation strategy, the determination of the current application is delayed so that this information can be gathered and presented in support of the application.

I have attached information on sources for archaeological contractors that the developer may wish to consider engaging to complete evaluation work and guidance on the evaluation process. All of the attached documents must be forwarded to the applicant/applicant's agent so that they are fully aware of the requirements.

Please contact me if you wish to discuss the above advice or require any more information.

Kind regards,

Neil Bayliss