

From: Neil Bayliss <neil.bayliss@cpat.org.uk>
Sent: 04 July 2024 07:46
To: Gwyn Humphreys; planning
Subject: FAO: Gwyn Humphreys RE: P/2024/0105 - Car Park, Queen Street, Cefn Mawr
Attachments: April 24 Heneb CPA AMaR guidance.pdf; April 24 Heneb CPA ClfA Recommended Contractors.pdf; April 24 Heneb CPA Level 3 Building Recording.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Good afternoon, Gwyn,

Thank you for the consultation on this development proposal.

My colleague, Mark Walters was consulted previously on the proposed works, however the text is incorrect in 2.3 of the Cultural Heritage Report, it should read Clwyd-Powys Archaeological Trust, not Glamorgan-Gwent (Although, post-merger in April 2024, Heneb: Clwyd-Powys Archaeology has now been adopted).

At the pre-application stage Mark commented that a detailed DBA and walkover survey should be completed, and this has been used to base our further recommendations. The DBA suggests that further works should include an earthwork survey, topographic survey, and historic building recording of all upstanding remains within the site and we recommend these are completed to a level 3 archaeological building recording standard (Information attached). The document also recommends that the construction of attenuation ponds, below-ground utilities and tree planting should be monitored with a watching brief (Re-named to Archaeological Monitoring and Recording (AMaR)), and information on this is also attached. Trial trenching is not recommended in this case due to likely contamination, health risks and the minimal impact on archaeology from the proposed development. This is in accordance with the Planning Policy Wales (Feb 2024) and TAN 24 (May 2017) guidance, and an appropriate condition is supplied below.

Mark noted in his comments that, 'the most important aspect of the car park site will be the line of the former Plas Kynaston Canal Branch and any visible remains of this, or associated features, on the northern boundary of the development area. Any surviving features of this former canal branch must be preserved on site and could benefit from some interpretation.'

We agree with the mitigation strategy proposed in section 6.2 of the cultural heritage assessment and the conclusions in section 6.1., but note that minor landscaping or ground intervention on, or near the former Plas Kynaston Canal Branch to the north of the site could have an impact on these remains and should be avoided.

Cadw should also be consulted with regard to impacts on the setting of Pontcysyllte Aqueduct and Canal scheduled monument (DE175) and its associated World Heritage Site.

The works should be completed by an archaeologist who is part of a recognised professional archaeological organisation working to the Standard and Guidance of the Chartered Institute for Archaeologists (CIFA) relating to Archaeological Monitoring and Recording. The archaeologist should be working in accordance with an approved project design/written scheme of investigation (WSI) and should preferably be part of a Registered Archaeological Organisation with CIFA accreditation.

A suitable condition to facilitate the archaeological monitoring and recording is provided below along with guidance notes for the applicant on how to commission archaeological works.

The conditions in this case would be:

1. Archaeological Monitoring and Recording (Formerly Watching Brief)

Suggested planning condition to facilitate an Archaeological Monitoring and Recording:

The developer shall ensure that a suitably qualified archaeological contractor is present during any groundworks on Site so that archaeological monitoring and recording can be conducted. The monitoring and recording must meet the standards laid down by the Chartered Institute for Archaeologists Standard and Guidance for Archaeological Monitoring and Recordings.

A copy of the resulting report should be submitted to the Local Planning Authority and the Development Control Archaeologist, Heneb: Clwyd-Powys Archaeology (neil.bayliss@cpat.org.uk). On approval by the Local Planning Authority, project data must be submitted and approved for inclusion in the Heneb: Clwyd-Powys Archaeology Historic Environment Record. For any questions regarding this submission process, please contact the HER Team at her@cpat.org.uk. The full digital archive must also be submitted and approved for inclusion within the National Monuments Record, RCAHMW or the Archaeology Data Service, ADS.

Reason: To secure preservation by record of any archaeological remains which may be revealed during ground excavations for the development.

2. Level 3 Building Recording

Suggested planning condition to facilitate a programme of a Level 3 Historic Building Survey, the equivalent of an Historic England Level 3 building survey, to allow an adequate analytical record of the earthworks, topography, and of all upstanding building remains within the Site to be made prior to demolition.

*No development shall take place until a programme of building recording and analysis, equivalent to an Historic England Level 3 building survey, has been secured and implemented, in accordance with a brief issued by the local planning authority and a written scheme of investigation which has been submitted and approved in writing by the local planning authority. The survey will be completed by a **professional archaeological contractor**.*

The programme of building analysis and recording must meet the standards laid down by the Chartered Institute for Archaeologists in their Standard and Guidance for the archaeological investigation and recording of standing buildings, features or structures.

A copy of the resulting report should be submitted to the Local Planning Authority and the Development Control Archaeologist, Heneb: Clwyd-Powys via neil.bayliss@cpat.org.uk (07496 984 393).

On approval by the Local Planning Authority, project data must be submitted and approved for inclusion in the Heneb: Clwyd-Powys Historic Environment Record [CPA HER]. For any questions regarding this submission process, please contact the HER Team at her@cpat.org.uk. The full digital archive must also be submitted and approved for inclusion within the National Monuments Record, RCAHMW or the Archaeology Data Service, ADS.

Reason: *To allow an adequate analytical record of the buildings, structures, or landscape before demolition and to ensure that the building's origins, use, and development are understood and the main features, character and state of preservation are recorded.*

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 survey.

I have attached information on sources for archaeological contractors that the developer may wish to consider engaging to complete the recording and monitoring work, along with information on the Archaeological Monitoring and Recording and Level 3 Building Recording guidelines.

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

Kind regards,

Neil Bayliss

Mr Neil Bayliss BA, PCIfA
Planning Archaeologist
Heneb: The Trust for Welsh Archaeology – Clwyd-Powys Region

Ffôn / Tel: +44 (0)7496 984393

The Offices, Coed y Dinas, Welshpool, SY21 8RP
Y Swyddfeydd, Coed y Dinas, Welshpool, SY21 8RP



www.heneb.org.uk

On 1 April 2024 the four Welsh archaeological trusts (Clwyd-Powys, Dyfed, Glamorgan-Gwent and Gwynedd) merged to form Heneb: the Trust for Welsh Archaeology.

Heneb is the trading name of The Trust for Welsh Archaeology

The Trust is both a Limited Company (1198990) and a Registered Charity (504616)

Registered address: Corner House, 6 Carmarthen Street, Llandeilo, Carmarthenshire, SA19 6AE

Ar 1af Ebrill 2024 unodd y pedair ymddiriedolaeth archeolegol Gymreig (Clwyd-Powys, Dyfed, Morgannwg-Gwent a Gwynedd) i ffurfio

Heneb: Ymddiriedolaeth Archaeoleg Cymru.

Heneb yw'r enw masnachu Ymddiriedolaeth Archaeoleg Cymru

Cwmni Cyfyngedig (1198990) ynghyd ag Elusen Gofrestredig (504616) yw'r Ymddiriedolaeth

Cyfeiriad cofrestredig: Tŷ Cornel, 6 Stryd Caerfyrddin, Llandeilo, Sir Gaerfyrddin SA19 6



Heneb is a Registered Organisation with the Chartered Institute for Archaeologists
Mae Heneb yn Sefydliad Cofrestredig gyda'r Chartered Institute for Archaeologists

Any of the statements or comments made above should be regarded as personal and not necessarily those of Heneb. This e-mail and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed.

Dylai'r datganiadau neu'r sylwadau uchod gael eu trin fel rhai personol ac nid o reidrwydd fel datganiadau neu sylwadau gan Heneb. Mae'r e-bost hwn ac unrhyw ffeiliau a drosglwyddir gydag ef yn gyfrinachol ac at ddefnydd yr unigolyn neu'r corff y cyfeiriwyd hwy atynt yn unig.

