

From: [Neil Bayliss](#)
To: [planning](#); [Gwyn Humphreys](#)
Subject: [DKIM:INVALID] FAO: Gwyn Humphreys RE: P/2023/0050 - Land At Stansty Fields, Mold Road, Stansty, Wrexham
Date: 02 March 2023 11:20:47
Attachments: [ARCHAEOLOGY AND PLANNING IN WALES 8 MARCH 2021.pdf](#)
[January 23 CPAT Contractors Information.pdf](#)

Good morning, Gwyn,

Regarding the consultation referenced above.

As mentioned earlier, we sent pre-application advice to the applicant that required a desktop study and walkover survey report to be completed due to the potential for unrecorded archaeology in this area, however the work has not been completed and should now be presented as supporting information with the application.

Information held within the Historic Environment Record indicates that although the site has no archaeological features superficially, the 1st edition Ordnance Survey mapping shows a rectangular pond near the eastern border of the application area, which has since been levelled and landscaped. Stansty Park (LB1535), a Grade II listed building with associated gateway, lies west of the site, but with no Cadw registered parkland associated. There is some potential for additional parkland or landscaping features to be present here on early documentary and mapping sources and the potential for previously unrecorded sub-surface archaeological deposits has not been quantified. The Built Heritage Conservation Officer should be consulted regarding any potential setting issues to the listed building, however the screening provided by the existing tree cover, 'A' road, and nearby commercial buildings should limit any significant setting issues.

The proposed development will disturb any surviving archaeological remains surviving here, but from present knowledge it is impossible to estimate how damaging this might be, and thus to frame an appropriate archaeological response. As archaeology is a material consideration here, I would advise that this application is not determined until this resource has been properly evaluated.

The evaluation will therefore include an initial desk top study and walkover survey. Depending on the results of this work additional geophysical survey and/or investigative trenching may be recommended at the pre-determination stage to assess the potential of surviving sub-surface remains. The evaluation trenching would target the new building footprints and the access roads. All work will be completed in accordance with the relevant CIFA standards and guidance on evaluation and project archiving and reporting.

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 have to 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 completed 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 developer will need to engage an archaeological contractor to complete this work in accordance with an approved written scheme of investigation 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. The chosen archaeological contractor will need to submit a **WSI (written scheme of investigation)** document to neil.bayliss@cpat.org.uk for approval before they can commence works on site.

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

Mr Neil Bayliss BA, PCIfA

Swyddog Rheoli Datblygiad / Development Control Archaeologist

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