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To: [planning](#)
Cc: [Neil Maylan \(Cadw Senior Historic Environment Planning Officer\)](#); [Cadw Planning \(cadwplanning@gov.wales\)](#)
Subject: P/2023/0497 Land North of Bryn Lane, Wrexham Industrial Estate, Wrexham - Hybrid Full and Outline for Industrial Premises
Date: 24 August 2023 15:18:23

Dear Sir or Madam

Thank you for the consultation on this application. We were previously consulted on the proposals at the pre-application stage and gave advice on the scope of the historic environment assessment to the archaeological consultant and to the LPA as part of a scoping opinion in December 2022. Unfortunately, since December 2022, we have had no further contact with the archaeological consultants and had expected to be consulted on the draft historic environment chapter of the ES so that identified impacts could be verified and mitigation agreed. There doesn't appear to be a specific historic environment chapter in the ES, but a Heritage Impact Assessment by The Environment Partnership (TEP), combining some elements of pre-determination assessment reporting, has been provided and it is the findings of this document that we will comment on below.

1. Pre-determination Evaluation Trenching

With regard to the Mitigation section (6.34 - 6.49) of the TEP report it is recommended in 6.47 - 6.48 that further assessment of the sub-surface potential of the development area should be completed through a scheme of investigative trial trenching. This is aimed primarily at defining the potential for archaeology which is earlier than the medieval and post medieval field systems which may have masked deeper sub-surface data on the geophysics results. As this would in effect be a further stage of pre-determination assessment designed to inform the ES and a subsequent mitigation strategy it should be completed at the pre-determination stage in accordance with:

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 evaluation should consist of a series of 100m x 2m randomly sited trenches amounting to a 2% sample of the development area to test for the presence/absence of sub-surface archaeology. The evaluation trenching should avoid damage to the well-preserved field system earthworks in Field 5 and the eastern half of Field 6. At least one trench should be aligned north/south in Field 2 to coincide with the approximate location of the NDHA94 Francis Lane aircraft crash site and test for metallic or other crash debris. An archaeological contractor will need to be engaged to carry out this evaluation in accordance with CIFA standards and guidance for field evaluation, reporting and archiving. A WSI must be submitted by the chosen archaeological contractor and approved by us before they commence work on-site. The results will be forwarded to the applicant, LPA and Planning services section of CPAT for further comment. A standard specification for evaluation trenching, reporting and archiving is attached.

2. Ridge and Furrow Field System Earthworks - Preservation

With regard to 6.41 and the mitigation for damage to the surviving ridge and furrow field system earthworks it is clear in 4.97 of the main report that Field 5, and to a slightly lesser extent Field 6, retain well preserved surface earthworks and related hedgerow field boundaries of medieval and post medieval date. Consideration should be given to removal of Fields 5 from the development proposal to preserve these earthworks which retain a characteristic curved profile and plan and are clearly related to similarly well-preserved earthworks adjoining the field to the east which can be seen on the lidar. Well preserved ridge and furrow field systems of this type are a characteristic feature of the Wrexham Maelor rural landscape and form part of the Historic Landscape Aspect for the Commonwood landscape area on the NRW LANDMAP database. This area is defined as Outstanding and of High value for its preservation of ridge and furrow field systems which are a rare and key element of this landscape.

The lidar data in the TEP report has mapped the ridge and furrow in high detail and we would not see any need for additional topographic survey as a condition of consent as this is unlikely to resolve more detail or be as accurate in plan as the lidar.

3. Hedgerows classed as 'Important'

Appendix C of the TEP report indicates that under the Schedule 1 Part II heritage criteria of the Hedgerow Regulations 1997 practically every hedgerow within the development north of Bryn Lane is classed as 'important' and therefore 'protected'. Normally no hedgerow that is deemed to be important and protected can be removed unless the LPA has received and considered a Hedgerow Removal Notice application. Normally where hedgerows are deemed to be 'important' the LPA would issue a hedgerow retention notice and the hedges would have to be retained. It would appear the current layout would remove approximately 50% of the 'important' hedges, which will also be of ecological value, and clearly the LPA will need to comment further on this significant landscape impact.

I look forward to approving the WSI for the pre-determination evaluation trenching and receiving any revised layout proposals which seek to preserve the historic landscape archaeological components identified above and in the TEP report.

Kind regards

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