

From: Neil Bayliss <neil.bayliss@cpat.org.uk>
Sent: 17 April 2024 09:57
To: Jenni Perkins; planning
Subject: FAO: Jenni Perkins RE: P/2023/0624 at Brymbo Iron And Steelworks, Heritage Centre, New High Street, Brymbo
Attachments: April 24 Heneb CPA AMaR guidance.pdf; April 24 Heneb CPA ClfA Recommended Contractors.pdf; April 24 Heneb CPA Level 2 Building Recording.pdf; April 24 Heneb CPA Level 3 Building Recording.pdf; Cadw Conservation Principles 2011.pdf; Managing Change to Listed Buildings in Wales May 2017.pdf; Understanding Scheduling in Wales Cadw.pdf
Follow Up Flag: Follow up
Flag Status: Completed

Good morning, Jenni,

Regarding the planning application referenced above.

We have received the Heritage Impact assessment from the contractor, and although the report has not yet been deposited with the HER team at Heneb: Clwyd-Powys Archaeology, the report has provided the information regarding further work on site.

The application has seen Cadw consulted regarding the ongoing works and a scheme of Archaeological Monitoring and Recording (AMaR) on the drainage scheme is recommended. However, a 'stop' caveat has been built into the recommendation to allow excavations to be extended to evaluate any uncovered and unknown archaeological resource, this was agreed between the Cadw representative and an archaeological contractor as a suitable way forward in this case. This is to prevent any unnecessary damage to the Brymbo Ironworks, Early Blast Furnace, Cast House & Foundry scheduled monument (DE202).

In this case we recommend that the drainage scheme, and any other ground disturbance on the site, is completed with a qualified archaeologist present due to the high potential for sub-surface archaeology. If archaeology is encountered, the archaeologist should be allowed to extend the excavation to completely understand the previously unknown structure, feature, or any other archaeological evidence. This is in accordance with the Planning Policy Wales (Feb 2024) and TAN 24 (May 2017) guidance, and an appropriate condition is supplied below.

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:

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 within the 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.

The site is of national, and even international interest, with its scheduled status, mentioned above and the Brymbo name synonymous with steel working around the globe, the buildings involved in the scheme will require recording in sufficient detail prior to alteration. However, not all buildings will require the highest level of recording and a scheme for the various level is included in the HIA provided.

The Building Recording Levels are noted below.

• Charging Wall	Level 3 Historic Buildings Record
• Agents House	Level 2 Historic Buildings Record
• Lamp Room and Winch House	Level 2 Historic Buildings Record
• Machine Shop	Level 3 Historic Buildings Record
• Scheduled Area	Level 4 Historic Buildings Record

In this case we would advise that the **Historic Building Surveys** are completed by an **approved archaeological contractor** in accordance with the Planning Policy Wales (Feb 2021) and TAN 24 (May 2017) guidance to retain a record of the building in its current historic form and suitable conditions are provided below.

Level 4 Building Recording (Under Cadw guidance)

The Level 4 survey would include a desk-based assessment to provide a building history, a detailed written descriptive survey of the present structures, detailed measured survey of the building in plan and elevation,

a detailed photographic survey, and phased plans of the area and its development over time. Level 4 provides a comprehensive analytical record and is appropriate for buildings of special importance. Whereas the analysis and interpretation employed at Level 4 will clarify the building's history so far as it may be deduced from the structure itself, the record at Level 4 will draw on the full range of other sources of information about the building and discuss its significance in terms of architectural, social, regional, or economic history. The range of drawings may also be greater than at other levels include all drawn and photographic records that may be required to illustrate the building's appearance and structure and to support an historical analysis.

Level 3 Building Recording

The level 3 surveys will include a desk-based assessment to provide a building history, a detailed written descriptive survey of the present structure, measured survey of the building in plan and elevation, a detailed photographic survey, and phased plans of the building's development over time. As expected, a **Level 2** survey will require slightly less detail in the report which will be explained to the contractor involved (Guidance attached).

*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 building to be made prior to alteration.*

*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 or structures.

A copy of the resulting reports 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 structures before alteration and renovation, and to ensure that their origins, use, and development are understood and the main features, character and state of preservation are recorded.*

I have attached documents for an Archaeological Monitoring and Recording, Levels 4, 3 and 2 Building Recordings and guidance on sources of archaeological contractors who may wish to tender for this work.

The chosen archaeological contractor will need to submit a project design/written scheme of investigation (WSI) document to me for approval before they can commence works on site.

Please contact me again if you wish to discuss this advice or require more information.

Kind regards,

Neil Bayliss

Mr Neil Bayliss BA, PCIfA
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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 Archaeolegol Cymru

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