

From: Mark Walters <mark.walters@cpat.org.uk>
Sent: 15 February 2024 12:34
To: Ross Cook
Cc: Geraint Roberts; James Barker; Ashley Batten; planning
Subject: P/2023/0624 and P/2023/0674 Brymbo Heritage Centre - Archaeological Evaluation and Updated Heritage Impact Assessment

Follow Up Flag: Follow up
Flag Status: Completed

Hi Ross

Thanks for the email.

No this would not be possible as the evaluation forms part of an assessment stage designed to understand the impact of the proposed works on the archaeological resource and it should be informing the applicant, the planners, ourselves and the consultant archaeologist (yourself) with regard to future mitigation that may be conditioned into the decision. This requirement is quite clear in the planning guidance included below and has been made clear to all involved at the pre-application and application consultation stages.

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 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'.

I think I should also make it clear to all that we are expecting the updated Heritage Impact Assessment to be written by a heritage professional who would in this case be the archaeological consultant for the scheme (i.e. yourself) or at least very heavily contributed to by a heritage professional. We have been consulted on a number of amended documents including a Mining Risk Assessment Survey and a Drainage Strategy and we would hope that you, as the consultant archaeologist, will have been made aware of

these amended documents and will adjust the potential impact and mitigation comments in the HIA accordingly.

We are particularly concerned about the nature of the groundworks associated with the suggested 'concrete infill' area in the drainage strategy immediately east of the scheduled area which may impact it and could result in sub-surface disturbance to archaeology. We also have concerns about the 650mm total depth cut for the 'granular storage' beneath the new car parking area and whether this will impact any intact sub-surface archaeology. These potential impacts and the suggested mitigation must be clearly presented in the HIA.

All the best

Mark Walters

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Please note that I do not work Fridays

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Mae'n bosibl nad yw'r datganiadau a'r safbwyntiau a fynegir yn yr e-bost hwn yn cynrychioli rhai Ymddiriedolaeth Archeolegol Clwyd-Powys.
Statements and opinions expressed in this e-mail may not represent those of the Clwyd-Powys Archaeological Trust.

From: Ross Cook <ross.cook@archaeodomus.co.uk>
Sent: 15 February 2024 12:04
To: Mark Walters <mark.walters@cpat.org.uk>
Cc: Geraint Roberts <Geraint@grauk.com>; James Barker <james.barker@tacparchitects.co.uk>
Subject: Machine Shop Evaluation

Hi Mark,

The design team for the Brymbo Heritage Project have asked if it might be possible for the evaluation for the extensions to the Machine Shop to be set as a pre-commencement condition? This would help with their timings for planning and HLF submissions.

All the best,

Ross

Ross Cook

Buildings Archaeologist & Dendrochronologist
Cathedral Archaeologist to St Davids and Canterbury
Consultant Archaeologist to Christchurch Priory

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