

From: [Neil Bayliss](#)
To: [Jenni Perkins](#); [planning](#)
Subject: FAO: Jenni Perkins RE: P/2024/0092 - Land Off, Croeshowell Hill, Rossett, Wrexham
Date: 08 March 2024 16:09:42
Attachments: [Dec 23 - CPAT - Eval Brief with DBA.pdf](#)
[Oct 23 - CPAT - House holders guide.pdf](#)
[Oct 23 - CPAT - Contractors Information.pdf](#)

Good afternoon, Jenni,

Regarding the planning application referenced above.

Information retained within the Regional Historic Environment Record indicates that this application falls in an area of archaeological sensitivity.

The proposed development lies in a field formerly occupied by a group of structures, possibly including greenhouses associated with the Mount Alyn property directly northeast and are shown on the 1st edition Ordnance Survey Mapping of the Mid-19th century. It is anticipated that the foundations and floor levels of these structures will survive as standing earthworks or sub-surface archaeology within the plot, and they would be directly impacted by the proposed dwelling layout.

The groundworks for the new buildings will disturb any 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. The planning authority appears to have insufficient information about this archaeological resource, or the applicant's intended treatment of it, to make a balanced decision. As archaeology is a material consideration here, I would advise that this application is not determined until this resource has been evaluated.

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 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 will include a desk top study including a prior site visit and may be followed up by pre-determination ground investigations using targeted trial trenching if the DBA/walkover identifies sites that may be impacted. All work will be completed in accordance with the relevant CIFA standards and guidance on evaluation and project archiving and reporting.

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 investigation.

I would advise that in order to allow sufficient time for an evaluation to be conducted, 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 and guidance on the evaluation process. 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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