

PAT Report No. 1613

Jacques Way, Wrexham

HERITAGE IMPACT ASSESSMENT



YMDDIRIEDOLAETH ARCHAEOLEGOL CLWYD-POWYS

CLWYD-POWYS ARCHAEOLOGICAL TRUST

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Prepared by:	Checked by:	Approved by:
		
Sophie Watson Project Archaeologist	Nigel Jones Principal Archaeologist	Nigel Jones Principal Archaeologist
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YMDDIRIEDOLAETH ARCHAEOLEGOL CLWYD-POWYS
 CLWYD-POWYS ARCHAEOLOGICAL TRUST

41 Broad Street, Welshpool, Powys, SY21 7RR, United Kingdom

+44 (0) 1938 553 670

trust@cpat.org.uk

www.cpat.org.uk

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Summary

A Heritage Impact Assessment has been conducted by the Clwyd-Powys Archaeological Trust in connection with a proposed residential development on land at Jacques Way, Wrexham.

The plot includes a section of Wat's Dyke, which here is designated as a scheduled ancient monument (SAM De 191), while no other heritage assets are recorded within the Development Area. There is no upstanding trace for the linear earthwork within the plot, although there is the potential for subsurface remains to survive, particularly in association with the ditch. However, archaeological work in the plot to the north, associated with the construction of the Premier Inn, indicated that quarrying had removed much of the ditch. Should any buried remains survive there is the potential for them to be impacted by the development.

The current nature of the plot, which is waste ground, does little to enhance the setting and value of the monument, providing no indication for the presence of an important Early Medieval linear earthwork. On the advice of Cadw, the development proposals include positive mitigation to raise awareness of the monument and enhance public appreciation of it.

1 Introduction

- 1.1. The Clwyd-Powys Archaeological Trust (CPAT) was invited by Castlemead Group Limited, on behalf of the Wales & West Housing Association, to undertake a heritage impact assessment in connection with proposals to redevelop land at Jacques Way, Wrexham, for 25 affordable residential units. The land lies to the rear of the Premier Inn, situated along the southern side of the A451 at NGR SJ 32847 50619.



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Fig. 1 Location of Development Area

- 1.2. The Scheduled Ancient Monument (De191) Wat's Dyke runs through the eastern part of the site, a pre-application consultation response from Cadw requested a full heritage impact assessment for the site.
- 1.3. Prior to the construction of the Premier Inn, which is located to the immediate north of the development plot, the site was formerly occupied by Jacques Garage and had been used as a scrap yard for a number of years. This area was the subject of an evaluation by CPAT in 2002 (Grant 2002), which identified limited survival for the

bank associated with Wat's Dyke, though the accompanying ditch had been removed by quarrying.

- 1.4. Further monitoring was undertaken by CPAT in 2012 during groundworks for the construction of the Premier Inn. This involved monitoring the controlled stripping of overburden across the area of Wat's Dyke to allow the protection of surviving deposits beneath a membrane prior to the reconstruction of the dyke's profile.
- 1.5. The assessment was conducted according to the Chartered Institute for Archaeologists' (CIfA) *Standard and Guidance for Historic Environment Desk-based Assessment* (2014).

2 Sources of Information & Guidance

- 2.1. Cultural heritage is deemed to include the complete range of man-made features that have been introduced into the landscape from the Palaeolithic, more than two hundred and fifty thousand years ago, up to and including the 20th century. Some of these features will be visible as upstanding remains on the ground; others will be buried and only become apparent during ground disturbance, whilst others may be objects that have been discarded, lost or deliberately deposited. Some will have an archaeological interest and importance; others will be more historical in their origin. In addition, some natural features will be relevant because of the information they contain; peat bogs, for instance, hold pollen that can throw light on past human activity in the area. Collectively, all these features are known as heritage assets.

Administration

- 2.2. At a national level, it is Cadw, the historic environment service within Welsh Government, which holds the remit for the cultural heritage resource. Another national body, Natural Resources Wales, has a particular interest in historic landscapes.
- 2.3. At a regional level, the cultural heritage resource is monitored by the Heritage Sections of the regional archaeological trusts. The Curatorial Section of the Clwyd-Powys Archaeological Trust (CPAT) act as archaeological advisers to Powys County Council.
- 2.4. While the broad concern of all these bodies is with the preservation of the cultural heritage, there are inevitably differences in emphasis between regional and national organisations, and in the laws and regulations that govern the ways in which they operate.

Legislation and guidance

- 2.5. The legislative framework for the historic environment in Wales was revised by The Historic Environment (Wales) Act 2016. The 2016 Act amended the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990. It extended the definition of scheduled monuments and enhanced their protection, as well as making changes to the process of scheduled monument consent. Changes were also made to the protection of listed buildings. The 2016 Act also provided for statutory a register of historic landscapes,

-
- a statutory list of place names, and imposed a statutory duty on Welsh Ministers to compile and maintain Historic Environment Records (HERs). Most of the provisions of the 2016 Act had come into force by 31 May 2017.
- 2.6. Chapter 6 of Planning Policy Wales was revised and re-issued in November 2016. Technical Advice Note 24: *The Historic Environment* (TAN 24) came into force on 31 May 2017, and replaced previous Welsh Office Circulars 60/96 *Planning and the Historic Environment: Archaeology*; 61/96 *Planning and the Historic Environment: Historic Buildings and Conservation Areas*; and 1/98 *Planning and the Historic Environment: Directions by the Secretary of State for Wales*.
- 2.7. Information on local planning policies relating to the cultural heritage is provided in Annex 1.
- 2.8. The revised Design Manual for Roads and Bridges (DMRB), Volume 11 Section 3 Part 2, HA 208/07 (August 2007), though not specifically focused on developments of this nature, provides a suitable, general framework for assessing the cultural heritage. The approach to the cultural heritage which it promotes, although designed for road developments, is relevant as a methodology for the proposed development and has been adopted here. The relevant sections relating to determining the value of assets and the magnitude and significance of potential impacts is reproduced in Annex 2.
- 2.9. The desk-based assessment was undertaken with reference to the principles and methods for assessing heritage assets laid out in the *Standard and Guidance for Archaeological Desk-based Assessments* (2014) produced by the Chartered Institute for Archaeologists (CIfA), the regulatory body for the profession.
- 2.10. Welsh Government's (2017) *Heritage Impact Assessments in Wales* sets out the general principles to consider when planning changes to historic assets and applying for listed building, conservation area and scheduled monument consent. This document, together with Cadw's (2011) *Conservation Principles for the Sustainable Management of the Historic Environment in Wales*, provides guidance on understanding historic assets, their significance and assessing potential impacts on them. The results of a heritage impact assessment should be summarised in a heritage impact statement and this process must be adopted in all cases where your proposals require listed building consent or conservation area consent.
- 2.11. Heritage impact statements are not required when applying for planning permission, including for development, in the following cases: within the setting of a listed building; within the setting of a scheduled monument; in a registered historic park and garden, or its setting; in a conservation area; and in a World Heritage Site. Nevertheless, in these circumstances, it is good practice to adopt the principles of the heritage impact assessment. There is a separate process for considering the impact of development in registered historic landscapes.
- 2.12. Planning Policy Wales (9th edition, 2016) identifies the desirability of preserving the setting of a World Heritage Site, a nationally important ancient monument (whether scheduled or unscheduled), a listed building, a Conservation Area and a site on the Register of Historic Parks and Gardens in Wales. This desirability will be a material consideration when assessing the potential impact of a development proposal on the historic environment. Recent guidance published by Welsh Government (2017) in

Setting of Historic Assets in Wales defines the setting of a historic asset as including 'the surroundings in which it is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive, negative or neutral contribution to the significance of an asset. Setting is not itself a historic asset, though land within a setting may contain other historic assets. The importance of setting lies in what it contributes to the significance of a historic asset. The setting of a historic asset can also include less tangible elements. These may include function, sensory perceptions or historical, artistic, literary and scenic associations'.

- 2.13. For the landscape in its entirety LANDMAP is the formally adopted landscape assessment tool for Wales, and is consulted in order to inform the baseline assessment of the study area. LANDMAP comprises of five evaluated Aspects, one of which – the Historic Landscape – is relevant to cultural heritage assessments, and a second – the Cultural Landscape – is partially relevant. All five aspects, the other three being Geological Landscape, Landscape Habitats and Visual & Sensory, are normally taken in conjunction (rather than individually) to assess the importance of a landscape under consideration (see CCW 2012), a process normally undertaken by a specialist in landscape and visual issues.

The categorisation and conservation of the cultural heritage resource

- 2.14. The cultural heritage resource is not a single body of equally significant assets, but an infinitely complex set of individual assets, the number of which increases and alters in form and relationships on a continual basis. They range in importance from internationally significant sites to features of minor and even negligible value, with those perceived to be of greater importance being categorised by designation (statutory) or registration (which may be statutory or non-statutory).

World Heritage Sites

- 2.15. This is the only category of international importance, although the designation of a World Heritage Site (WHS) does not confer additional statutory protection. Instead, the protection of World Heritage Sites in the UK is managed through existing designation (i.e. Conservation Areas) and planning regimes (i.e. Local Development Plans).

Scheduled Ancient Monuments

- 2.16. SAMs are designated features of national importance. They are protected under the Ancient Monuments and Archaeological Areas Act, 1979, as amended by the Historic Environment (Wales) Act 2016. The settings of SAMs are also protected, as articulated in Planning Policy Wales (9th edition, 2016), specifically Chapter 6 (Conserving the Historic Environment) which notes that 'the desirability of preserving an ancient monument and its setting is a material consideration in determining a planning application' (6.5.1). Setting in relation to all heritage assets, whether designated or not, is discussed further below.

Listed Buildings

- 2.17. These are protected under the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended by the Historic Environment (Wales) Act 2016. All listed

buildings are nationally important, but are graded in order of significance as Grade I, II* or II. Grade I buildings are considered to be of equal status to Scheduled Ancient Monuments. Local planning authorities must have special regard to the desirability of preserving the setting of a listed building regardless of its grade, and it also requires planning proposals to meet the test of determining the extent to which a development affects views to and from a listed building. Planning Policy Wales (9th edition, 2016) requires a 'general presumption in favour of the preservation of a listed building and its setting, which might extend beyond its curtilage' (6.5.10).

Conservation Areas

- 2.18. These are protected under the Planning (Listed Buildings and Conservation Areas) Act 1990. This Act requires local planning authorities to have special regard to the desirability of preserving the setting of a Conservation Area, and it also requires planning proposals to meet the test of determining the extent to which a development affects views to and from such an area. Planning Policy Wales (9th edition, 2016) states that there 'will be a strong presumption against the granting of planning permission for developments ... which damage the character or appearance of a conservation area or its setting to an unacceptable level' (6.5.19).

Registered Parks and Gardens, and Historic Landscapes

- 2.19. The Historic Environment (Wales) Act 2016 provides for the creation of a statutory Register of Parks and Gardens of Special Historic Interest in Wales. Parks and gardens are graded using the same categories as listed buildings (i.e. I, II*, II). Parks and gardens are therefore 'registered' rather than 'designated' assets, though for practical purposes this distinction appears to be of little significance. Planning Policy Wales (9th edition, 2016) states that local authorities should 'protect and conserve' registered parks and gardens and their settings, and that Cadw must be consulted on any development which is 'likely to affect the site of a registered historic park or garden or its setting' (6.5.24). Similarly, the inclusion of an area on the (non-statutory) Register of Historic Landscapes is a planning consideration, and again Cadw should be consulted on any development 'within a registered historic landscape area that requires an Environmental Impact Assessment' (6.5.25).

Battlefields

- 2.20. England has a Battlefields Register, but there is at present nothing comparable for Wales. A Welsh register is currently in preparation, but its form and composition is not known, nor when it will be made available.

Designated wrecks

- 2.21. The Protection of Wrecks Act 1973 allows the designation of a restricted area around a wreck to prevent uncontrolled interference. These protected areas are likely to contain the remains of a vessel, or its contents, which are of historical, artistic or archaeological importance. There are six designated wrecks in Wales.

Aircraft Crash sites

- 2.22. All military aircraft crash sites in the United Kingdom, its territorial waters, or British aircraft in international waters, are controlled by the Protection of Military Remains

Act 1986. Under this act it is an offence to tamper with, damage, move, or unearth any remains without a licence from the Ministry of Defence.

Undesignated assets

- 2.23. These are undesignated heritage assets which may survive both above ground where they are still visible and/or buried beneath the surface. These could range in date from the prehistoric era through to the 20th century.

Historic Hedgerows

- 2.24. Various criteria have been used to classify historic hedgerows. In the context of a current cultural heritage assessment those that are most relevant are where a hedgerow incorporates or is part of an archaeological site and where it marks a pre-1850 parish or township boundary. In this region there is generally so little published information on estate or manorial boundaries, another pair of criteria, that assessment utilising them is not feasible.
- 2.25. A further criterion (as cited in The Hedgerows Regulations of 1997 – SI No.1160) is ambiguous in stating that the regulation applies to a hedgerow that is recorded in a document held ‘...at a Record Office as an integral part of a field system pre-dating the Enclosure Acts’. This was qualified in guidance issued by DEFRA in May 2002 which stated that 1845 was the accepted cut-off date.

3 The Cultural Heritage History of the Area

- 3.1. This section provides a brief summary of the archaeology and history of the study area and its immediate surrounds, to enable the findings of the assessment to be placed in a wider context.

Roman

- 3.2. Early settlement evidence for this area of Wrexham has been identified around 1km to the north-west of the development, at Plas Coch where several phases of Romano-British occupation have been confirmed by excavation. The settlement evidence may be dated broadly to the 2nd and 3rd centuries AD and included ditches, post-holes, the remains of a corn-drying kiln, a possible hearth and stone buildings with associated Romano-British pottery.

Early Medieval

- 3.3. Wat's Dyke, a large linear bank and ditch running for about 62km (38.6 miles) from Basingwerk in the north to the valley of the Morda (a tributary of the Severn) runs directly through the Development Area. The ditch measures between 2-4m deep and 4-8m wide and the bank still survives in places to a height of 2m.
- 3.4. The ditch was probably largely V-shaped and in places at least the bank was built on a cobble base, with a marker bank setting out the line prior to construction and large stones set along it at intervals apparently designating sections for the workmen. It was both designed and then built with great care and is one of the largest earthworks in Britain, after the nearby Offa's Dyke. Limited scientific dating suggests an overall date range of AD 742-1002, with the emphasis on the early 9th century.

- 3.5. The ditch faces westwards, suggesting it was built to defend against the Welsh, but equally it may be interpreted as agreed frontiers and/or military borders and also as a statement of prestige. Wat's Dyke seems to have been constructed as a single monument without sign of secondary maintenance though it continued to form variously a political or administrative boundary during in succeeding episodes of history.
- 3.6. Within the Development Area there are no upstanding remains for the monument, although subsurface deposits may survive, particularly within the ditch. The bank was levelled during historic quarrying and development activities, although archaeological evaluation immediately to the north has confirmed the presence of basal bank deposits, as well as the partial survival of the ditch.

Medieval

- 3.7. Wrexham was referred to as Wristlesha in 1161, the present form appearing about 25 years later. The Old English wryhta signifying 'workman' or 'handicraftman' gave rise to a personal name, Wryht(a) and in this instance was combined with ham(m) meaning 'homestead' or 'village community'.
- 3.8. The medieval town was founded sometime before 1220, the date at which St Giles' church was constructed, and is believed to have grown around the residence and maerdref of a 12th-century Welsh lord on the north bank of the Gwenfro.
- 3.9. By the early 14th century there was a thriving community at Wrexham, with a predominantly Welsh population with settlement spreading out from the church in a northerly direction as far as Lambpit Street.
- 3.10. In the 15th century, if not earlier, its economy was boosted by the development of iron and coal mining in the immediate vicinity. A tanning industry is also thought to have existed at this time.

Post-medieval

- 3.11. The prosperity of the town in the post-medieval period is reflected in the construction of a number of large residences for the wealthy industrial families on the outskirts of the town centre although many of these large houses known as Plasau were destroyed in the 19th century.
- 3.12. In 1643 a quarter of the town around the market area was destroyed by fire. The rebuilt town centre was displayed on John Wood's map of 1833, by which time the brewing, tanning and ironworking industries were well established, though the town was not granted the status of chartered borough until 1857.
- 3.13. Generally, within the historic core of Wrexham, very few buildings of architectural and historic value have survived. This is a result largely of the redevelopment of the town centre in the late 19th century when the railway was driven through the heart of the town. Town centre development in the 1960s also contributed greatly to the demolition of late medieval and post-medieval buildings.
- 3.14. Wrexham is now the largest town in north Wales and serves an increasingly important function in education, employment and retail at a regional level.

The Development Area

- 3.15. As mentioned above, the line of Wat's Dyke, an early medieval linear earthwork, runs directly through the Development Area and is protected as a Scheduled Ancient Monument (De191). A previous archaeological evaluation immediately to the north identified the presence of the ditch and bank material relating to the dyke's construction (Grant 2002).
- 3.16. The Ordnance Survey 1st edition 1:2,500 map (Fig. 2), surveyed in 1872, shows the area before any development had occurred, with the exception of the railway forming the eastern boundary. Within the Development Area, the map shows a boundary as a dotted line which follows the line of Wat's Dyke.

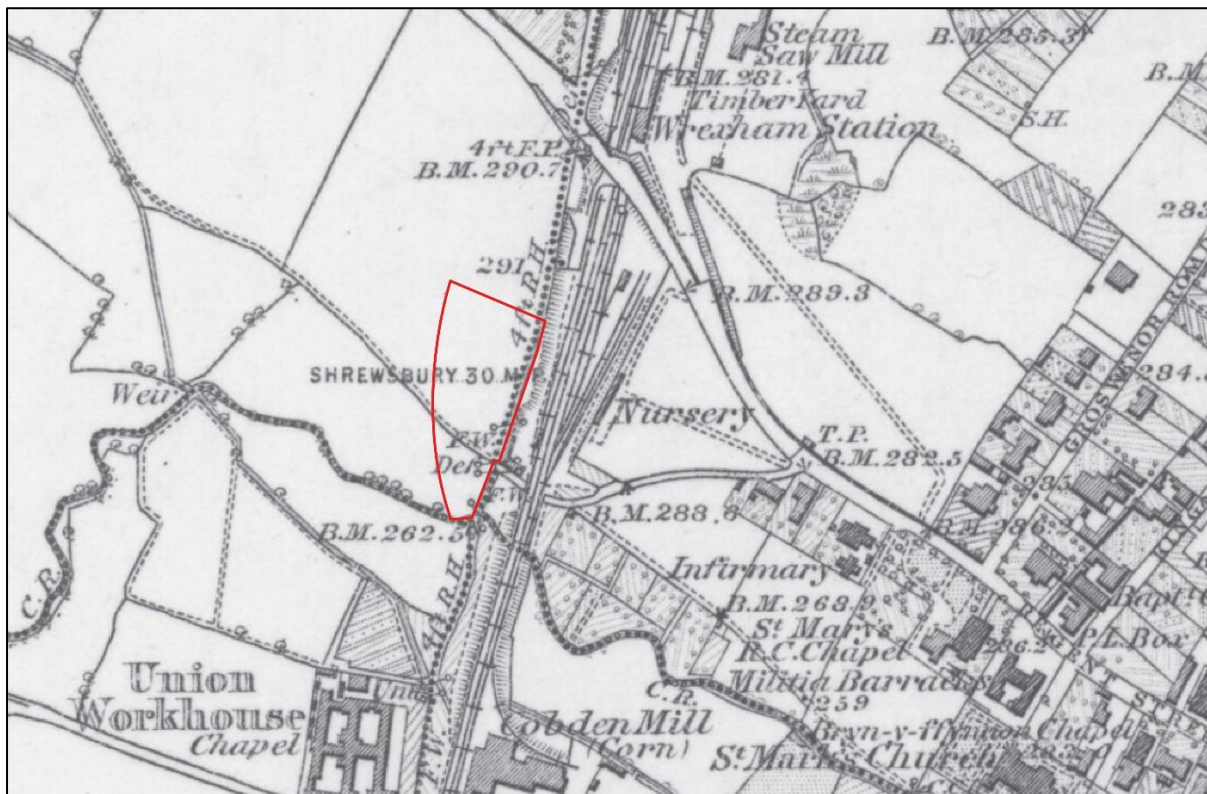


Fig. 2: Extract from the Ordnance Survey 1st edition 25" mapping of 1872, showing the Development Area in red

- 3.17. By the time the 2nd edition 1:2,500 map of 1899 was published (Fig. 3), the western part of the Development Area appears to have been reduced, probably in relation to the construction of the Wrexham and Ellesmere railway branch which ran north-south along the western boundary of the Development Area. By 1912, further landscaping has taken place to the north of the Development Area on the land now occupied by the Premier Inn.

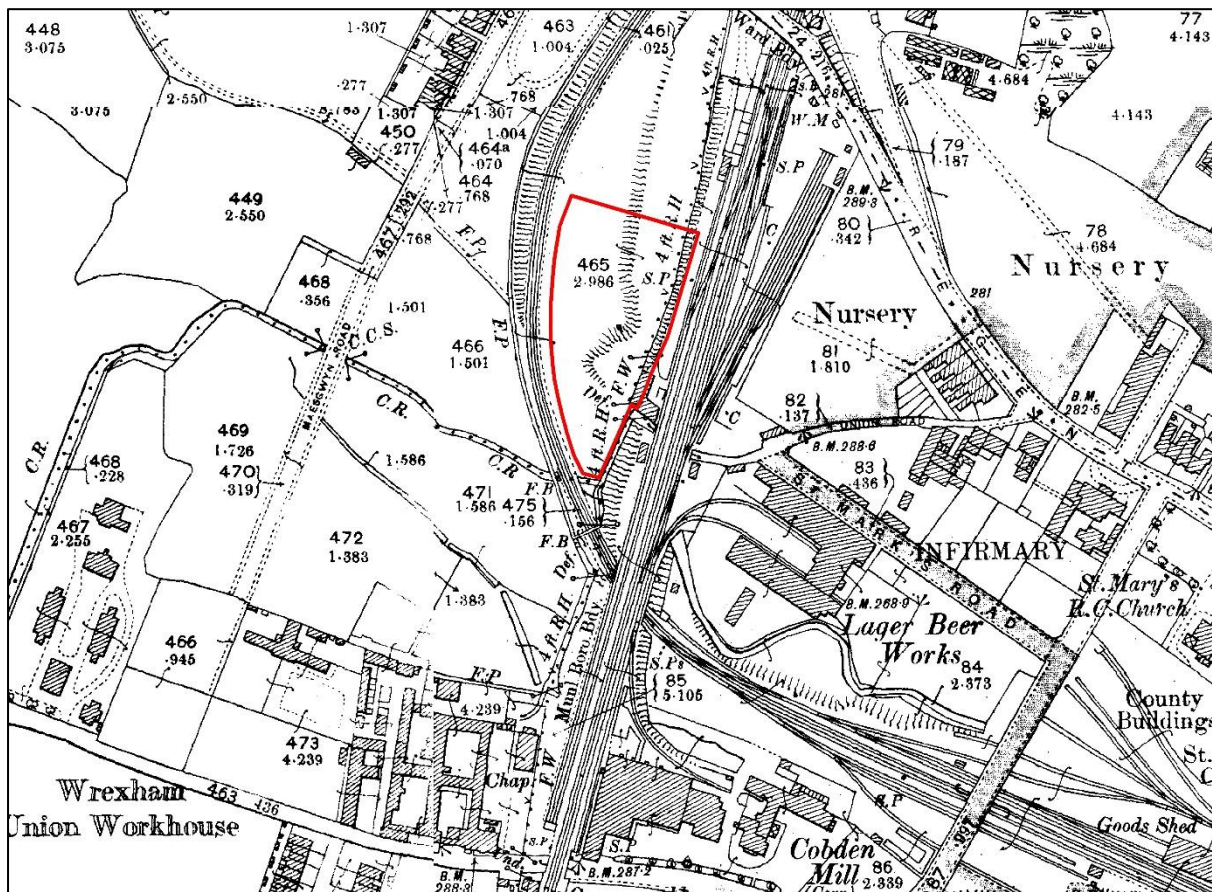


Fig. 3: Extract from the Ordnance Survey 2nd edition 25" mapping of 1899, showing the Development Area in red

- 3.18. During the 20th century the site is known to have been used as a quarry and was later occupied by Jacques Garage and used as a scrapyards for a number of years, resulting in a considerable build-up of material on top of the area of Wat's Dyke.
- 3.19. The 2002 watching brief indicated that extensive quarrying within the area had resulting in the loss of much of the line of Wat's Dyke. An upstanding embankment was provided to be relatively modern, although it followed the line of the dyke. However, the removal of the modern bank revealed the fragmentary survival of the basal layers of the bank of Wat's Dyke, although quarrying appeared to extend as far as the bank on the western side, having removed all trace of the ditch (Fig. 4). The only exception was at the southern end of the plot, where the eastern edge of the ditch was identified, indicating that the ditch may also survive further to the south, within the Development Area.



Fig. 4: Bank material exposed during 2002 watching brief.

- 3.20. The line of the bank for Wat's Dyke was subsequently reconstructed as part of the Premier Inn development (Fig. 5).

4 Baseline Assessment

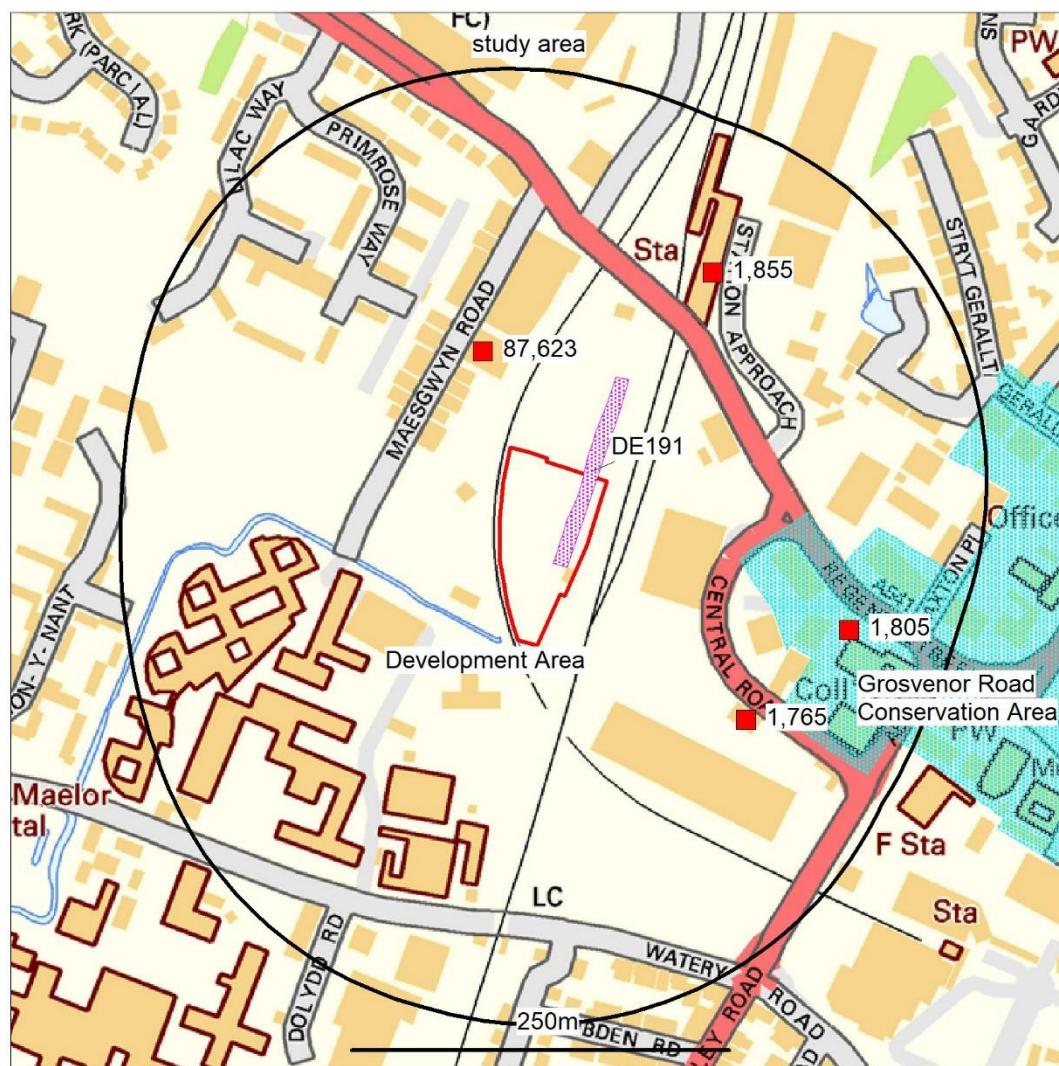
- 4.1. The assessment involved the examination of all the readily available primary and secondary sources at the following repositories:
- the regional Historic Environment Record
 - the National Monuments Record
 - Cadw, for designated assets
- 4.2. The baseline assessment has considered all heritage assets recorded within the Development Area, as well as those which lie within 250m.

Designated and Registered Heritage Assets within 250m of the Development Area

- 4.3. The following provides details of all designated and registered heritage assets within 250m of the Development Area. The assessment has identified one scheduled ancient monument, four listed buildings and one conservation area (Table 1; Fig. 5). It should be noted at this stage that all nationally designated assets are automatically considered to be of high value (see Annex 2 Table 3.1).

Table 1: Designated and Registered Heritage Assets within 250m of the Development Area

Designated asset	Within the Development Area	Within 250m
World Heritage Sites	0	0
Scheduled Ancient Monuments	1	1
Listed buildings	0	4
Registered historic parks and gardens	0	0
Registered historic landscapes	0	0
Conservation areas	0	1



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Fig. 5: Designated heritage assets within 250m of the Development Area.

Scheduled Ancient Monuments

- 4.4. The Scheduled Ancient Monument known as Wat's Dyke (De191) runs directly through the Development Area, along the eastern boundary of the site in a north-east/south-west direction, and extends into the adjacent plot to the north. The dyke is presumed to be a defensive bank and ditch, constructed in the 8th century AD, though only sub-surface deposits are thought to survive in this area.
- 4.5. Archaeological evaluation on the site of the Premier Inn in 2002 confirmed the presence of probable original bank material surviving beneath a later 20th century embankment. The ditch appeared to have been quarried away across most of the site, although possible traces of the ditch edge were identified towards the southern end of the plot, indicating the potential for ditch deposits to survive within the Development Area.

Listed Buildings

- 4.6. There are four grade II listed buildings within 250m of the Development Area.

Table 2: Listed Buildings within the 250m of the Development Area

List No	Name	Grade	Type	NGR	Distance
1805	Adult Education Centre, University College of North Wales	II	House	SJ33055057	180m
1765	Offices and Lodge to Wrexham Lager Brewery, Central Road.	II	Offices and Lodge	SJ32985050	140m
1855	Wrexham General Station: Entrance Building, Station Approach	II	Station Building	SJ32975080	150m
87623	The Former Mines Rescue Centre	II	Rescue Centre	SJ32815074	65m

1805 No. 51 Adult Education Centre, University College of North Wales, Regent Street

- 4.7. Originally built as a house in the 1850s but now used as adult education centre. The house is a good example of a Victorian town house. Regent Street, along which it lies was developed in the mid-19th century as a major axis route out to the west of the town, along which important civic buildings were constructed.

1765 Offices and lodge to Wrexham Lager Brewery, Central Road

- 4.8. Located at the entrance of the former Wrexham Larger Brewery and built as the Brewery office building in around 1881. The office building is the only part of the original brewery layout which survives substantially in its original condition. First brewed on this site in 1882, Wrexham Larger was the first to be brewed in Great

Britain. The building is a good example of late 19th-century commercial architecture, in which aspects of the design are used to suggest the character of the product.

1855 Wrexham General Station

- 4.9. Station entrance building constructed around 1875 as a replacement for the original provided by Henry Robertson for the Shrewsbury and Chester Railway Company, formed in 1846. The building is a good example of GWR station architecture which, with its fine canopy, survives intact.

87623 The Former Mines Rescue Centre

- 4.10. Mines Rescue Station established by the North Wales Coal Owners Association in 1913. The station is a complex of buildings with a fine facade in orange and grey brick to Maesgwyn Road. A semi-circular terracotta panel over a doorway carries the inscription 'North Wales Coal Owners Association' in art-nouveau lettering. The centre closed in the 1980s.

Conservation Areas

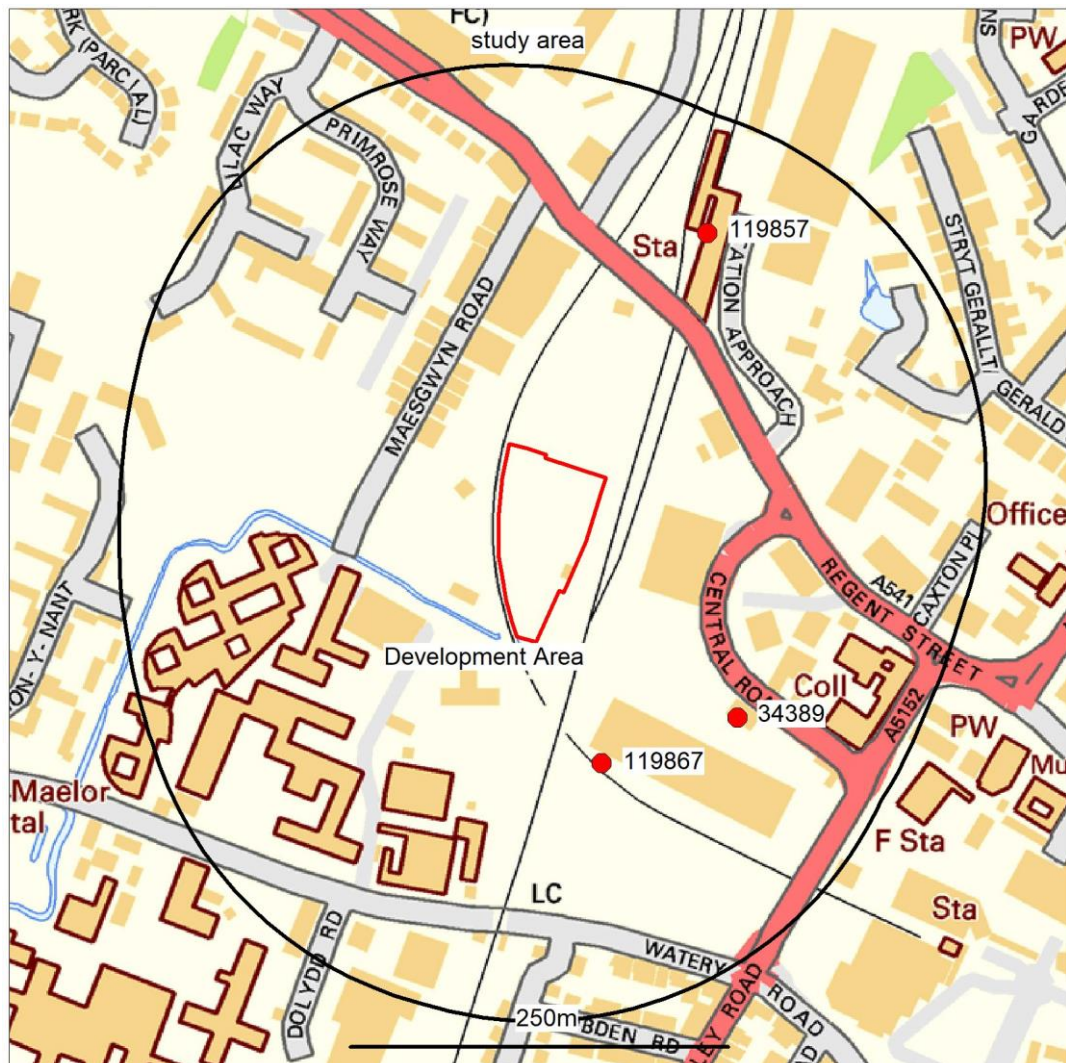
- 4.11. The Grosvenor Road Conservation Area is located approximately 100m to the east of the Development Area, to the north-west of the commercial town centre. It incorporates Grosvenor Road, Grove Road and parts of Bradley Road, Regent Street, Caxton Place, King Street, Rhosddu Road and Grove Park Road. Also included is part of the Yale College campus.
- 4.12. Though predominantly 19th-century, many of the buildings within the conservation area are of architectural interest and include an assortment of both civic buildings as well as characterful domestic buildings which include elevational design and ornamentation with materials such as dressed stonework, terracotta and decorative iron railings. There are strong and distinct original building plot widths and continuous building lines as well as a number of important views and vistas. For example, Regent Street offers far-reaching views of the Esclusham Mountains, allowing the setting of the town within the surrounding area to be appreciated.

Undesignated Assets within 250m of the Development Area

- 4.13. The regional HER records three undesignated assets within 250m of the Development Area (Table 3; Fig. 6).

Table 3: Undesignated heritage assets within the Development Area

PRN	Name	Period	Type	NGR
PRN 119857	Shrewsbury and Chester Railway (Welsh section)	Post-medieval	Railway	SJ32965082
PRN 34389	Wrexham Lager Brewery	Post-medieval	Brewery	SJ32985050
PRN 119867	Wrexham, Mold and Connah's Quay Railway, Wrexham (Exchange) to Wrexham (General)	Post-medieval	Railway	SJ32895047



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Fig. 6 Undesignated heritage assets within 250m of the Development Area

PRN 119857 Shrewsbury and Chester Railway (Welsh section)

- 4.14. The Shrewsbury and Chester Railway line was constructed in 1846 and is depicted on the Ordnance Survey 1st edition 25" mapping of 1872. The North Wales Mineral Railway, connecting Chester via Wrexham to Ruabon, had been constructed from 1844 to take advantage of mineral rights. However, realising that it offered connection opportunities between the Port of Liverpool and the industrialised Midlands, the railway applied to extend to Shrewsbury. This was initially refused by Parliament, but was later authorised in 1845. The line is still in use today.

PRN 34389 Wrexham Larger Brewery

- 4.15. The Wrexham Larger Brewery was "Established in 1882 by German immigrants but went into voluntary liquidation. It was taken over by Robert Graesser, a German chemist, who improved the brewing and widened the range of beers. The brewery

closed in 2000 and with the exception of the brewery office (PRN 32704) the site was demolished in 2003.

PRN 119867 Wrexham, Mold and Connah's Quay Railway, Wrexham (Exchange) to Wrexham (General)

- 4.16. A half-mile railway line extension from the WM&CQR's Wrexham Exchange station to a new station, Wrexham Central. Work began in May 1885 and involved tunnelling under the GWR railway. The first train ran on November 1st 1888 (Pratt 2009, 184).

5 Impact Assessment

- 5.1. The potential impacts which may result from the development proposals have been assessed in accordance with the DMRB guideline for determining the value of an asset and the potential impacts (see Annex 2).

Direct Impacts

- 5.2. The assessment has identified a single heritage assets within the Development Area, a scheduled section of Wat's Dyke (SAM De191). While there is no longer any visible trace of an upstanding bank the existing evidence suggests that potentially important deposits may survive within the Development Area, possibly including the basal deposits associated with the bank or, more probably, the remains of the ditch.
- 5.3. Fig. 7 shows that the scheduled area, and therefore the line of Wat's Dyke, coincides with the location of housing plots on the eastern side of the proposed development. The groundworks in this area therefore have the potential to impact on buried archaeological deposits, should they survive within the scheduled area, and also the along the line of the dyke further to the south. It should be noted, however, that extensive quarrying has taken place within the area which may have already had a significant impact on the dyke. Nevertheless, should archaeological deposits survive, the groundworks have the potential for a **moderate** impact on this high value asset, the significance of which would be **moderate/large**.
- 5.4. In addition to the need for planning permission, any ground disturbance, site clearance or construction works commencing within the scheduled area will require Scheduled Monument Consent from the Welsh Ministers.



Fig. 7: Plan showing the Scheduled Area of Wat's Dyke in relation to the proposed Development

Indirect Impacts

- 5.5. The assessment has also considered potential impacts to the setting of the scheduled ancient monument of Wat's Dyke, in accordance with the methodology outlined in the Welsh Government's best-practice guidance *Setting of Historic Assets in Wales* (2017).
- 5.6. This section of Wat's Dyke was scheduled in 1977, based on the assumption that the visible earthwork was a surviving part of the bank associated with the dyke. As noted above, however, it has since been demonstrated that this was relatively modern, although slight, fragmentary remains of the bank and ditch were confirmed beneath the modern earthwork.



Fig. 8 View of the scheduled area of Wat's Dyke from the north-east, with the Development Area beyond the Premier Inn.

- 5.7. The scheduled area occupies a narrow strip immediately to the west of the railway and for the most part to the east of the Premier Inn, although Fig. 7 suggests that the eastern side of the building impinges onto the scheduled area. The Development Area is currently wasteland, with the scheduled area extending part way down the eastern side (Fig. 9).



Fig. 9 View towards the scheduled area of Wat's Dyke from within the Development Area.

- 5.8. The monument is only really appreciated in views from the nearby railway bridge (Fig. 8), and from the Premier Inn, its carpark and entrance. In these views the setting is enhanced by the reconstruction of that section of the monument as a low bank, which provides an impression of the original form of the monument (Fig. 10).



Fig. 8: The reconstructed section of the bank along the eastern side the Premier Inn, viewed from the north.

- 5.9. While the reconstruction of the monument at the Premier Inn clearly enhances the setting of Wat's Dyke, the Development Area provides no such compliment. There is no visible earthwork here and nothing to indicate the position or alignment of the dyke within an area of waste ground. As such the plot does nothing to enhance the value or appreciation of the monument.
- 5.10. The proposed development will clearly alter significantly the setting for this section of the scheduled area, replacing the waste ground with residential housing. This too would do little in itself to enhance the setting of the dyke. However, at a meeting between the developers and Cadw's Regional Inspector for Ancient Monuments in September 2016 it was suggested that the development might reflect the linear nature of the dyke where it runs through gardens by the use of fencing, profiled to suggest the presence of a bank, rather than by reconstructing a bank, as at the Premier Inn. This has been adopted as part of the development proposals, which also include the provision of an information plaque or board at the entrance to the Premier Inn, highlighting the presence and importance of Wat's Dyke. Consequently, this is seen as positive mitigation, the result of which would be to enhance the setting of the monument, as well as raising public awareness of this nationally important monument.
- 5.11. With regard to potential indirect impacts on other designated assets within the immediate area, at this stage final details of the proposed development are not available, precluding any assessment of indirect, visual impacts on the four list buildings and the conservations area within 250m of the Development Area. However, the Development Area is isolated from these assets by major infrastructure, such that fieldwork suggests it plays no part in their setting and the proposals are therefore unlikely to have a significant visual impact, and certainly far less so than the adjacent Premier Inn.

6 Sources

Published sources

Cadw, 2007. Guide to good practice on using the Register of Landscapes of Historic Interest in Wales in the Planning and Development Process. 2nd (revised) Edition. Cardiff: Cadw.

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Pratt, D., 2009. Withered branches: Wrexham's vanished railways. *Denbighshire Historical Society Transactions* 57, 109-190.

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Unpublished sources

Grant, I., 2002. *Wat's Dyke, Jacques Garage, Mold Road, Wrexham: Archaeological Watching Brief*. CPAT Report 492.

Cartographic sources

1872 Ordnance Survey 1:2500 1st edition Denbighshire 28.12

1899 Ordnance Survey 1:2500 2nd edition Denbighshire 28.12

7 Archive deposition Statement

- 7.1. The project archive has been prepared according to the CPAT Archive Policy and in line with the CIfA *Standard and guidance for the creation, compilation, transfer and deposition of archaeological archives guidance* (2014). The archive is entirely digital and will be deposited jointly with the Historic Environment Record, Clwyd-Powys Archaeological Trust and the National Monuments Record (RCAHMW).

Annex 1 - Local Policies

Local Policies

Cultural heritage assets without statutory protection are curated by the archaeological advisors to the local planning authorities and afforded protection through Local Development Plan policies.

Those planning policies specific to the protection of cultural heritage assets include those in the Wrexham Unitary Development Plan which was adopted in February 2005. Wrexham County Borough Council is currently preparing the Local Development Plan (LDP) 2013-2028, which will replace the UDP, although for the time being the following UDP policies can be cited:

Policy EC4 Development proposals should provide for the conservation and management of hedgerows, trees, orchards, woodland, wildlife and other natural landscape and water features, and include new planting in order to enhance the character of the landscape and townscape. Development which results in the loss or significant damage to valuable trees, important hedgerows or ancient woodland sites will not be permitted.

Policy EC5 Within Special Landscape Areas, priority will be given to the conservation and enhancement of the landscape. Development, other than for agriculture, small-scale farm-based and other rural enterprises, and essential operational development by utility service providers, will be strictly controlled. Development will be required to conform to a high standard of design and landscaping, and special attention will be paid to minimising its visual impact both from nearby and distant viewpoints.

Policy EC7 Within, and in close proximity to, conservation areas, the priority will be to preserve and/ or enhance those buildings, structures, streets, trees, open spaces, archeological remains, views, and other elements which contribute to the unique character of the area. New buildings and alterations or additions to existing buildings in conservation areas, whether listed as of special architectural or historic interest or not, must reflect the design and character of the area as a whole and the form, scale, detailing and materials of existing buildings.

Policy EC8 The demolition of any building in a conservation area will not be permitted unless, in exceptional circumstances:-

- a) the building or structure is beyond reasonable repair; or
- b) demolition would be a positive benefit to the conservation area's enhancement; and
- c) planning permission has been granted and a legal agreement entered into for the erection of an appropriate replacement building reflecting the design and character of the conservation area.
- d) the material generated from the demolition of the building will, where appropriate, be used for the construction of the replacement building or structure.

Policy EC9 Alterations or additions to, and development or redevelopment within the curtilage of, buildings or structures listed as of special architectural or historic interest must respect the setting and character of the listed buildings or structures.

Policy EC11 Development which would adversely affect the site or setting of a Scheduled Ancient Monument or archeological site of national significance will not be permitted.

Development that directly affects non-scheduled sites of archeological importance will only be permitted if an archeological investigation has been carried out to determine the nature, extent and significance of the remains, and this investigation indicates that in-situ preservation is not justified, and a programme of excavation and recording has been agreed. Development will also be carefully controlled to ensure that the setting of non-scheduled sites of archeological importance is not harmed where appropriate.

Annex 2 - Significance Criteria

Table 3.1: Definition of Value of Heritage Assets

Very High	World Heritage Sites (including those nominated) Assets of acknowledged international importance • Assets that can contribute significantly to acknowledged international research objectives.
High	Scheduled Ancient Monuments (including those proposed) Undesignated monuments which could potentially be worthy of scheduling Listed Buildings – Grade I, II* and II Registered Historic Landscapes, Parks and Gardens • Undesignated assets that can contribute significantly to acknowledged national research objectives.
Medium	Conservation Areas • Undesignated assets that contribute to regional research objectives.
Low	Undesignated assets of local importance Assets compromised by poor preservation and/or poor survival of contextual associations • Assets of limited value, but with the potential to contribute to local research objectives.
Negligible	• Assets with very little or no surviving cultural heritage interest.
Unknown	• Importance of the asset not ascertained.

The assessment of the magnitude of effect considers the extent to which a heritage asset may be changed or affected by the proposed development through the introduction of new structures or the infrastructure. The thresholds for assessing magnitude of effect are set out in Table 3.2 which is derived from the DMRB Volume 11 Section 3 Part 2, Annex 5/13, 2007, although in a slightly form for each cultural heritage sub-topic (archaeology, buildings, etc) has its own set of determining factors, which are set out in detail in the DMRB.

Table 3.2: Definition of Magnitude of Effect

Major	• Changes to most or all of the key cultural heritage elements such that the assets Comprehensive changes to setting • Extreme visual effects
Moderate	Changes to many key cultural heritage elements such that the asset is clearly modified Considerable changes to setting which affect the character of the asset • Visual changes to many key elements
Minor	Changes to key cultural heritage elements such that the asset is slightly altered or different Sight changes to setting • Slight visual changes to a few key elements
Negligible	Very minor changes to cultural heritage elements, or setting • Virtually unchanged visual effects
No Change	• No change

A part of the EIA process is to extrapolate the degree of significance from the predictions of impact. No formal guidance from Welsh government currently exists for the assessment of significance of effects on heritage assets, but the DMRB does provide an alternative. The severity of the effect on heritage assets depends on both the magnitude of effect and the value or importance of the asset, as exemplified in the two tables above. Table 3.3 illustrates how information on the value of the asset and the magnitude of effect can be combined to arrive at an assessment of the significance of effect. This process ensures consistency in assessing the significance of effect, and serves as a check to ensure that judgements regarding value, magnitude and significance of effect are balanced. While the correlation of these two sets of criteria is a mechanical process, professional judgement provides the reasoned explanation of the rationale behind the conclusions that are drawn. For example, a highly valued heritage asset may require only a limited amount of change to result in an effect that is assessed as moderate or major, whereas a greater magnitude of change is likely to be required to result in equivalent effects on a less sensitive asset.

Table 3.3: Matrix for assessing significance of direct and indirect impacts on heritage assets

Magnitude of Effect	Value of Heritage Asset				
	Very High	High	Medium	Low	Negligible
Major	Very Large	Large/ Very Large	Moderate/ Large	Slight/ Moderate	Slight
Moderate	Large or Very Large	Moderate/ Large	Moderate	Slight	Neutral/ Slight
Minor	Moderate/ Large	Moderate/ Slight	Slight	Neutral/ Slight	Neutral
Negligible	Slight	Slight	Neutral/ Slight	Neutral/ Slight	Neutral
No change	Neutral	Neutral	Neutral	Neutral	Neutral

In the context of the EIA Regulations an impact judged to be moderate or greater is deemed to be 'significant'. Any effect which is considered significant under the EIA Regulations is flagged as such in the text of the main report.