

From: Mark Walters <mark.walters@cpat.org.uk>
Sent: 27 May 2021 13:58
To: planning
Subject: [DKIM:INVALID] P/2021/0436 Land to the South of Holt Road, Wrexham - Archaeological Investigation Conditions

Dear Matthew

Thank you for the consultation on this outline application.

As you will be aware this development area was the subject of archaeological evaluation, including geophysical survey and investigative trenching of anomalies revealed by that survey, at the pre-planning stage.

It is clear from the evaluation results so far that the development site includes some significant prehistoric archaeology as identified in trenches 1,2,10. As stated in 8.9 of the L-P Archaeology report none of the prehistoric features were present on the geophysical survey data and this leaves us with a problem in terms of quantifying just how much prehistoric archaeology we have here and how widespread it is over the development site. Just targeting the three positive trench locations with further work could be entirely misleading and may result in the loss of other concentrations of prehistoric activity in the untested areas. Given the large size of the development area the evaluation trench sample size has been very low so far as it was primarily targeting the geophysical anomalies.

The applicant and applicant's agent did not wish to pursue additional evaluation trenching at the pre-determination stage as advised but were happy to meet the costs of additional evaluation, and any resulting mitigation, as conditions of consent. This adds financial risk for the developer and they have been advised of this, but they wish to proceed with conditions.

Therefore, in accordance with Planning Policy Wales (Feb 2021) and TAN 24 (May 2017) we would advise that further archaeological investigation needs to be completed at this development site to identify and preserve by record any archaeology that will be damaged or destroyed by the permitted construction works. Suitable conditions to secure this have been supplied below. The wording of these conditions should not be altered without additional consultation.

Conditions to allow addition evaluation and investigation as a condition of consent:

No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work. This will comprise:

i) The developer will ensure that a suitably qualified archaeological contractor is employed to carry out a scheme of additional archaeological evaluation to inform on the extent and nature of prehistoric and later archaeology which was not detected by prior geophysical survey and then inform further mitigation. The archaeological evaluation will be carried out in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the local planning authority and must meet the standards laid down by the Chartered Institute for Archaeologists in their Standard and Guidance for archaeological field evaluation. A copy of the evaluation report shall be submitted to the Local Planning Authority for approval. Following approval, the report will inform further works necessary. The approved report will be submitted to the Development Control Archaeologist, the regional Welsh Archaeological

Trust for inclusion in the Historic Environment Record (HER) and the National Monuments Record, RCAHMW.

ii) Following on from the evaluation, any safeguarding measures required to ensure preservation in situ of important archaeological remains and/or further archaeological investigation, recording and reporting shall be implemented. These works will be undertaken in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the Local Planning Authority. A copy of any additional resulting report shall be submitted to the Local Planning Authority for approval. Following approval, the report will be submitted to the Development Control Archaeologist, the regional Welsh Archaeological Trust for inclusion in the Historic Environment Record (HER) and the National Monuments Record, RCAHMW.

Please contact me if you wish to discuss any of the above.

Kind regards

Mark Walters

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