

From: Mark Walters <mark.walters@cpat.org.uk>
Sent: 22 March 2021 17:29
To: planning
Cc: Sharon Holman
Subject: [DKIM:INVALID] P/2021/0199 (Full) and P/2021/0198 (LBC) Reconstruction Of Former Cottages To Create A Holiday Cottage at 9-10 Bunkers Hill Cottage, Bersham - Objection

Dear Sharon

Thank you for the consultation on this application for the renovation of the former cottages at 9-10 Bunkers Hill, Bersham.

These buildings are currently Grade II listed (Cadw Ref. 1720) and consist of two former industrial workers cottages of single storey height and originally two rooms per cottage. The buildings had long attached garden plots to front and rear with toilet and washing buildings located initially to the south and then moved to the north of the cottages. They were built in 1785 for workers at John Wilkinson's Bersham Ironworks and are thought to be one of the earliest rows of industrial houses in Wales. The structures are therefore nationally important heritage assets.

Through neglect the buildings have significantly decayed since the 1970's and are now highly ruinous with collapsed walls and roof structures that are barely visible above ground level in places. The internal floor levels and the positions of the walls and fireplaces will be intact along with any artefacts spanning the entire use of the buildings. The former buildings have therefore become an entirely archaeological site retaining a designation more appropriate to standing buildings.

The application presented does not appear to be a true reconstruction of the listed buildings, but is rather a demolition and the erection of a replacement dwelling on the same site. The surviving walls are not capable of being used as a foundation for a rebuild as suggested in the documents supplied and would have to be taken down completely and rebuilt to appropriate building control standards. In addition the insertion of a new floor slab with underfloor heating and other services would have a detrimental impact on the surviving ground floor archaeology of the building resulting in the complete replacement of the current ground floor. The proposed layout clearly does not reflect the original plan layout of the cottages with former fireplace locations altered, internal walls removed and multiple new openings in the internal and facade walls for new windows and doors where there were none historically.

The Heritage Impact Statement (HIS) supplied is a very poor document which has not been written by a competent heritage professional with a built heritage conservation or archaeological background. There is no detailed supporting Heritage Impact Assessment. The HIS does not adequately address the major changes to the historical character, archaeology and significance of the original buildings which are proposed. Consequently, it is impossible to fully assess the potential impacts of the development on the significance of the historic asset in its standing building and sub-surface archaeological form and more detailed assessment would be required by a specialist.

In its current form the application fails to preserve or enhance the structural and archaeological remains at this location which form part of the unique character and industrial heritage of Bersham in accordance with Wrexham UDP policy EC7. Under Policy EC9 the redevelopment of the site does not reflect the original character of the listed building and its curtilage as indicated by the significant changes in the historical layout between the proposed and existing plans of the buildings.

Under Policy EC11 the redevelopment of this site would result in a direct impact to the surface and sub-surface archaeological remains of a designated site of national importance and no appropriate assessment has been carried out.

We would therefore object to the proposed development in its current form due to the considerable impact of the proposals on the remaining standing structure and sub-surface archaeology of the site and the lack of any appropriate specialist assessment.

Kind regards

Mark Walters

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Development Control Archaeologist / Swyddog Rheoli Datblygiad

Please note that our office is closed due to the coronavirus situation and I am working from home

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