



Head of Planning Services
Merthyr Tydfil County Borough Council
Unit 5 Triangle Business Park
Pentrebach
Merthyr Tydfil
CF48 4TQ

30th January 2019

FAO: Huw Roberts

Dear Sir

Re: The retention of an affordable housing scheme (8 flats) and associated off-street parking. Re-grading and engineering works to provide a reinstated landscaped embankment on land to the north east of the flats:

Former Labour Exchange, Penydarren Road, Merthyr Tydfil.
Pl.App.No.: P/19/0001.

Thank you for consulting us regarding this application; consequently we have consulted the detailed information contained on your website. **The proposal will require mitigation.**

As you will recall, archaeological field evaluation was undertaken at this site, as a Roman fort, with associated features including buildings, and roads, is located adjoining the site. The evaluation identified ditches associated with the fort, and other features and finds of Roman date. We had recommended that further development work be undertaken in accordance with an archaeological written scheme of investigation, and a WSI was subsequently approved. We understand that the development is to be retained in the sense that not all of the work will be completed, but also that the slope will be re-profiled, with drainage works. This work may also encounter features and finds relating to the Roman fort and its environs.

As the nature of the development has changed, the WSI needs replacing to reflect this so that when the archaeological contractor undertakes the mitigation on site, the methodology is clear and specific to the work. We therefore recommend that a condition should be attached to any consent to ensure appropriate mitigation, requiring the applicant to submit a programme of archaeological work in accordance with a written scheme of investigation should be attached to any consent granted by your Members.

We envisage that this programme of work would be an archaeological watching brief during any ground disturbing work, identifying any elements of the proposals which may also need to be hand-dug by archaeologists, which will also ensure that a targeted programme of work can be facilitated, with detailed contingency arrangements including the provision of sufficient time and resources to ensure that archaeological features that are located are properly excavated and analysed, and it should include provision for any sampling that may prove necessary, post-excavation recording and assessment and reporting and possible publication of the results.

The Glamorgan-Gwent
Archaeological Trust
Limited

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To ensure adherence to the recommendations we recommend that the condition should be worded in a manner similar to model condition 24 given in Welsh Government Circular 016/2014

No development shall take place until the applicant, or their agents or successors in title, has secured agreement for a written scheme of historic environment mitigation which has been submitted by the applicant and approved by the local planning authority. Thereafter, the programme of work will be fully carried out in accordance with the requirements and standards of the written scheme.

Reason: To identify and record any features of archaeological interest discovered during the works, in order to mitigate the impact of the works on the archaeological resource.

We also recommend that a note should be attached to the planning consent explaining that:

A detailed report on the archaeological work, as required by the condition, shall be submitted to and approved in writing by the Local Planning Authority within six months of the completion of the archaeological fieldwork

The historic environment mitigation work must be undertaken to the Chartered Institute for Archaeologists (CIfA), "Standard and Guidance for Building Recording" (www.archaeologists.net/codes/ifa) and it is our Policy to recommend that it is undertaken either by a CIfA Registered Organisation (www.archaeologists.net/ro) or an accredited MCIfA level Member.

If you have any questions or require further advice on this matter, please do contact us.

Yours faithfully

A handwritten signature in black ink that reads "Judith Doyle". The signature is written in a cursive, flowing style.

Judith Doyle BA MBA MCIfA
Archaeological Planning Officer