

## Appendix B – Consultation Responses and Proposed Response

	Responses to Consultation	Monmouthshire County Council
1	NATS Safeguarding: 'NATS has no comments to make on the Archaeology in Planning Advisory Note.'	<i>No action required.</i>
2	<p>Councillor David Dovey:  'Might I ask are we sure that there are no further areas in Chepstow that need further investigation [for archaeological potential] ie) Bulwark camp area and the lower end of Chepstow.</p> <p>Additional Comment 1:  'Thank you for the e mail. My original really came out of a wish (rightly or wrongly) to ensure that Chepstow did not get missed out; "have not extended to Chepstow at this time" was the trigger for my question. Please believe. I am not trying to awkward</p> <p>Additional Comment 2:  'Thank you for that, it is appreciated. Just one point, I was not recommending I was just raising two areas as examples of possible potential. Thanks again.</p>	<p><i>It is welcomed that the document raises the awareness of archaeology in the wider area, however the document has been prepared with extensions to existing ASAs in mind. The document will be subject to periodical review and so this will be a good opportunity to add further areas if considered necessary and with the support of the Council's archaeological advisors in the future.</i></p> <p><i>It is important to note that areas outside the ASAs should also be appropriately assessed in terms of the impact on any potential archaeological resource through the planning process. The ASAs are intended to highlight particular areas of importance at early stages, this does not de-value the importance of any archaeological sites outside these ASAs.</i></p> <p><i>Applications in all areas that require survey data will submit this data to the statutory Historic Environment Record which helps to provide a greater understanding of archaeology in Monmouthshire.</i></p> <p><i>No additional changes have been made in relation to this comment.</i></p>
3	<p>Member of the Public (Steve Gill):  'Dear Sirs Again this policy intends to put the financial burden on the applicant. The purpose is to record and preserve if possible the archaeology. The reasons are to provide a public record of the past. Archaeology and the recording is kept for all to access now and forever for everybody. The burden on the applicants should be to provide the time and</p>	<i>The points raised are relevant on a national scale as the requirements for archaeology and the impact of development on the archaeological potential of sites is set out by Welsh Government rather than individual authorities. The proposed document does not alter or increase the burden over and above the existing legislative situation. The document seeks to clarify why the Local Planning Authority are charged with asking for additional survey information.</i>

<p>access to the site. The cost of the recording and preservation should be borne by the public / lottery purse as it is for public use. Expecting ordinary property owners to foot an open ended bill is just plain unfair and ridiculous. Especially as the applicant has no copyright to the paid for reports etc.</p> <p>PS this would encourage the reporting of more finds by owners and builders in all parts of the county. (as long as the relevant authority acts with reasonable speed so as to cause minimum delay to the work .’</p> <p>Additional Comment:</p> <p>‘Thanks for taking my thoughts on board.</p> <p>I would like to add that every heritage department should have a roving archaeologist who could look at all excavations ...i.e. roadworks footings etc. in known sensitive areas. Nothing too complex just look into holes as dug. The utility companies are always digging trenches in historic ground. How often do they call in and expert. The Council themselves dig holes and fill collapses in. I think a lot is missed during "public works" again so as budgets and timescales are met.</p> <p>The whole heritage / archaeology system needs streamlining to make it more efficient for the benefit of all.</p> <p>A footnote of interest ... last autumn I visited national library of wales at Aberystwyth to look at amongst other things a Troy estate holdings book. In this book was something of relevance to me. I asked if I could photograph the page ... I was told the only option was a photo copy by them at a cost of £45. I refused on principle as the book had been donated to the museum and was relevant to my property and i am a proud citizen of wales. I wonder if the people who donate these things know about this aspect. Heyho there’s a lot could be better in the heritage for all world ‘.</p>	<p><i>No additional changes have been made in relation to this comment.</i></p> <p><i>The additional points provided by the consultee are also relevant on a national scale. Welsh Government altered the archaeological system in the 1970s to delegate it to the Welsh Archaeological Trusts who act on behalf of all the Local Authorities instead of in-house archaeologists.</i></p> <p><i>The current form of the heritage and archaeological system is also set up within the legislation provided by Welsh Government. Whilst there are system reviews in place, this is considered to be beyond the scope of the Planning Advisory Note.</i></p> <p><i>No additional changes have been made in relation to this comment.</i></p>
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4	<p>Member of the Public (Andrew Bailey):</p> <p>‘Having received your letter about Planning Policy, I have looked at the Draft Planning Advisory Notes, and would like to raise two questions that come to mind.</p> <p>Firstly, can you please outline what the difference is, if any, for planning applications in ASA's compared with general planning applications.</p> <p>Secondly. From a wider perspective, are ASA's chosen entirely by the Public Authority or can there be some input from individual members of the public and/or perhaps academic institutions or any other non-governmental organisation ?’</p> <p>Additional Comment:</p> <p>‘Thank you for your reply. I now have a clearer understanding. I only have a passing interest in archaeology and am not qualified to make a valued judgement. However, I will just say that I was surprised to note that Chepstow and perhaps the coastal levels were not to be included as an A.S.A.. With regard to the channel coast area, I realise that there is unlikely to be much cause for planning applications but that need not necessarily be a relevant factor. If it were included it would be a cautionary signal to any developers - which is a desirable goal by itself.’</p>	<p><i>The response highlights the necessity of the proposed document for members of the public and others who require guidance. The document has been amended to provide more clarity in relation to this point and to re-inforce that the statutory duty to consider archaeology in the planning process covers all aspects of planning not just development within the ASAs. See paragraph 1.3 of the PAN.</i></p> <p><i>The consultee received an explanation to the specific second query, and so no additional comments are provided in the guidance.</i></p> <p><i>Comments in relation to additional areas for designation are addressed in response 2.</i></p>
5	<p>Abergavenny Local History Society:</p> <p>‘Abergavenny: We were pleased to see that the area of Bailey Park and Hereford Road has been included in the area of archaeologically sensitive areas. This seems eminently sensible given that many remains from the Roman era have been discovered along the line of the present Hereford Road. The recently discovered Roman Road at the rear of Gunter Mansion in Cross Street is already within the designated area. Currently we have no</p>	<p><i>Welcome the support for the inclusion of the extension to existing ASAs and the designation of Tintern as an ASAs as per the document.</i></p> <p><i>No additional changes are required in relation to this comment.</i></p>

	<p>other recorded discoveries which might be compromised by development in areas outside the proposed archaeologically sensitive areas.</p> <p>The inclusion of Tintern is overdue and welcome. The other extensions in Monmouth and Trellech seem very reasonable.'</p>	
6	<p>The Royal Commission for Ancient and Historical Monuments Wales (Richard Suggett and Dr Toby Driver):</p> <p>'Thank you for the opportunity to comment on the draft archaeology in planning advisory note. The document is to be welcomed, especially the clear statement on archaeologically sensitive areas.</p> <p>I have several comments on the draft text:</p> <ol style="list-style-type: none"> <li>1. My colleague, Toby Driver, points out that the archaeological summary needs some revision. Compression has led to the omission of the early medieval period and early Christian monuments. The paragraphs relating to the prehistoric and Roman periods need revision. Toby Driver's comments on the archaeology follow my observations.</li> <li>2. The role of the Royal Commission on the Ancient and Historical Monuments of Wales needs to be clearly stated in the document. The Royal Commission has a leading national role in developing and promoting understanding of the archaeological, built and maritime heritage of Wales, as the originator, curator and supplier of authoritative information for individuals, corporate and governmental decision makers, researchers, and the general public. The Royal Commission holds a unique collection of photographs, maps, images, publications and reports within its archive, <u>The National Monuments Record of Wales</u>, which can be consulted on our online database <u>Coflein</u> or by making an enquiry to our <u>Enquiry Services section</u>.</li> </ol>	<p><i>The report has been put together with the advice from our archaeological advisors. Following the comments a revision of the section has been deemed suitable to ensure that summaries of the archaeological areas still maintain accuracy and importance. Changes have been made to paragraph 3.4</i></p> <p><i>The role of the R.C.A.H.M.W. has been highlighted in line with their suggested wording in paragraph 1.10.</i></p> <p><i>The commission's details have been added to the list of organisational contacts at the end of the document.</i></p> <p><i>Relevant changes have been made in relation to paragraphs 3.1 – 3.3 as suggested.</i></p>

3. The Royal Commission should be added to the list of organisational contacts in section 8. Our suggested wording is: The Royal Commission on the Ancient and Historical Monuments of Wales (RCAHMW) maintains a large archive (the National Monuments Record of Wales: NMRW) of plans, images, aerial photographs and maps relating to the archaeological and built heritage of Monmouthshire and Wales generally. Use COFLEIN ([coflein.gov.uk](http://coflein.gov.uk)), the Royal Commission's online database, to search for sites, check archival holdings, and view images. For further information, please contact the NMRW Library and Enquiry Service at:

- RCAHMW, Ffordd Penglais, Aberystwyth, Ceredigion SY23 3BU.
- 01970 621200
- [rcahmw.gov.uk](http://rcahmw.gov.uk)
- online database of sites = [coflein.gov.uk](http://coflein.gov.uk)
- [nmr.wales@rcahmw.gov.uk](mailto:nmr.wales@rcahmw.gov.uk)

**Comments by Dr Toby Driver, RCAHMW, on sections 3.1 and 3.2:**

I would suggest an archaeologist should revisit Section 3 for a more thorough re-write which correctly and succinctly describes the rich upstanding and plough-levelled archaeology of Monmouthshire. A useful reference for a non-specialist would be Frank Olding's *Archaeology of Upland Gwent* (RCAHMW, 2016).

**3 Archaeology in Monmouthshire**

3.1 Monmouthshire is a primarily agricultural county with three main settlements, Monmouth, Abergavenny and Chepstow. Remains show that people have settled here from the Mesolithic and Neolithic periods, with finds predominantly located in the Levels; more widespread evidence has been discovered from the Bronze Age [not the Iron Age as stated] including

	<p>flint spearheads and burial mounds, while the pre-Roman Iron Age saw the construction of a significant number of upstanding Iron Age hillforts including sites like the Bulwark promontory fort in Chepstow, together with a number of ploughed out lowland defended enclosures visible as cropmarks during aerial reconnaissance (for an accessible account see: Olding 2016).</p> <p>3.2 A significant impact on the development and landscape of Monmouthshire came with the Romans. Consolidation of their conquest remains through the civil city of Caerwent, forts and garrisons discovered in Abergavenny (Gobannium), Usk (Burrium), and Monmouth (Blestium); further evidence of their society is evident in the roads connecting civil and military centres, the thinning of the forests, draining of marshes and the formation of earthwork defences. The remains of lowland rural villas and Romano-British farmsteads, small military installations and camps from the campaigning period continue to be discovered across Monmouthshire as cropmarks during aerial reconnaissance, and there remain significant gaps in our knowledge of the Roman military network in south-east Wales.</p> <p>Reference: Olding, F. 2016. <i>The Archaeology of Upland Gwent</i>. RCAHMW, Aberystwyth.</p>	
7	<p>Glamorgan Gwent Archaeological Trust (Judith Doyle): ‘Thank you for consulting us regarding this document. The document appears to be a substantial rewrite of the document we wrote and provided in 2017. Unfortunately, the rewrite appears to have considerably altered the original document, and has resulted in factual errors and inconsistencies. We have checked through the document and note the following: Paragraph 1.4 and 1.8 As part of the planning process, for up to date HER data, the applicant’s archaeologist must make full, formal search of the HER. Archwilio is not appropriate for planning or development, it is contrary to their terms and conditions to do so: <a href="https://archwilio.org.uk/arch/archwilio_pages/english/conditions.html">https://archwilio.org.uk/arch/archwilio_pages/english/conditions.html</a>. Any archaeological commercial project and report that sources Archwilio will be rejected. <a href="http://www.ggat.org.uk/her/her.html">http://www.ggat.org.uk/her/her.html</a> is the appropriate contact link and a formal search of the HER must be made.</p>	<p><i>It is acknowledged that the document has been heavily edited in order to make it fit for purpose and reach a wider audience. Therefore part of the editing is aiming to use a language that is less technical whilst still maintaining factual accuracy. Amendments have been made to ensure that the accuracy of the text is not compromised by the changes in language. It is important to note that the document is a guidance document relating to the management of archaeology within the planning process and is not intended to be descriptive document of the archaeological resource.</i></p> <p><i>The consultation response has highlighted the following errors within the report:</i></p> <ul style="list-style-type: none"> <li>- <i>The Historic Environment Record website link</i></li> <li>- <i>Paragraph 4.11 regarding the requirement of submission and approval of archaeological works prior to the implementation of works</i></li> <li>- <i>Section 6, two of the terms are incorrectly described</i></li> </ul>

<p>Paragraph 1.6 This needs rewording as the original meaning of the draft ASA has been lost – it is not about the range of artefact/material types that can be found but exceptional conditions in the ground that enable the survival of palaeoenvironmental remains.</p> <p>Section 2 This should contain the Best Practice Guidance also.</p> <p>Section 4 It should be noted that Welsh Government strongly advise earliest stage consultation rather than at determination stage.</p> <p>Paragraph 4.4 At pre-planning stage, dependent on the nature of the archaeological resource, evaluation, geophysical survey or excavation may be recommended and undertaken. Any resulting report would need to be submitted with the application rather than could, in order to comply with PPW and TAN24.</p> <p>Paragraph 4.8 This is not correct. The terminology used is incorrect. A desk-based assessment is always undertaken prior to determination. This may or may not recommend further mitigation works, some of which, if field evaluation, is undertaken prior to determination of an application. Field evaluation may be required prior to determination without an assessment having been undertaken. GGAT can provide a brief for evaluation, but the specification must come from the archaeological contractor to show compliance with the brief and meet the professional Standard. These pieces of work cannot be conditioned.</p> <p>Paragraphs 4.9 The conditions we recommend come from <a href="https://gov.wales/use-planning-conditionsdevelopment-management-wgc-0162014">https://gov.wales/use-planning-conditionsdevelopment-management-wgc-0162014</a> The Use of Planning Conditions for Development Management. In order for the work to comply with Professional Standards: 4.10 “...building recording reports, watching briefs or written schemes of investigation...” are not “standard conditions”. These are examples of various types of archaeological works; and written schemes of investigation detail the methodology/methodologies of the archaeological work to be undertaken.</p> <p>4.11 Any form of archaeological works should be undertaken to an agreed Written Scheme of Investigation (WSI), which outlines the methodology for the mitigation. the WSI may be overarching, and would need a Project Specification/Method Statement to provide the detail. These documents</p>	<p>- Paragraphs 8.2 and 8.5 regarding the professional responsibilities and advice that South Wales organisations provide</p> <p><i>These errors will lead to difficulty and confusion from the potential users of the document. It is important to avoid this and therefore, the final document will be amended.</i></p> <p><i>In particular,</i></p> <p><i>Paragraph 4.4: There is no formal requirement for an applicant to engage with archaeology prior to submitting an application; it is instead advised by Welsh Government. The wording of the paragraph will be altered to make it clearer that any applications that have had archaeological work carried or intend to do so prior to submitting an application.</i></p> <p><i>Paragraph 4.8: It is considered that desk-based assessments are only required when justified, rather than on every occasion. With this in mind, the wording of the paragraph will be amended in the final document to make it clearer when these forms of investigation are requested.</i></p> <p><i>Paragraph 4.10: The advice provided within the consultation response shall be taken on board and the wording shall be amended. It is considered that the majority of the applications with archaeological conditions applied to them involve the above reports and documents more often than others.</i></p> <p><i>Section 6: The glossary was amended to refer to terms within the document. Whilst it is appreciated that this is a source of enquires for G.G.A.T., additional information would be required to establish the types of enquires they receive. Overall, the changes that have been advised have been assessed and taken on board to ensure that the accuracy of the document is improved for potential users.</i></p>
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	<p>should be submitted and approved prior to implementation and not “...maybe required to be submitted...” The deposition of the resulting archaeological archive is subject to NPAAW requirements, a non-artefactual archive is subject to the RCAHMS Digital Deposition requirements. As part of the requirements of the Welsh Government Legislation the report should be deposited in the HER.</p> <p>5 Archaeologically Sensitive Areas Rewording the descriptions has made the reasoning unclear in standard historic environment terminology. The inclusion of the number and nature of designated and undesignated historic assets is part of the standard format for this document.</p> <p>6 Glossary We recommend that the full content of our glossary is included. The glossary in the draft has some period descriptions but not all. The alteration includes information incorrect to the UK, eg, Bronze Age, the timeline for Europe which has been placed in your draft, does not relate to the UK, the terminology in our 2017 document is correct. The explanation of archaeological terms should be revised, as the meaning of these often forms the basis of queries we receive. Some of the meanings stated are incorrect, or incomplete, meanings should include:</p> <p>6 anaerobic – oxygen depleted Palaeoenvironmental – past environments</p> <p>Paragraph 8.2 This mentions “archaeological areas”, as the advisors to your Members, this should fall also in section 8.3.</p> <p>Paragraph 8.5 There is a need to clarify the Landscapes contacts. NRW are the contact for the Landmap Landscapes. GGAT and Cadw are the contact for the Registered Landscapes (The Gwent Levels; The Lower Wye Valley, and Blaenavon, are in Monmouthshire).</p> <p>If you require further information, please do contact us. Yours faithfully Judith Doyle BA MBA MCIfA Archaeological Planning Officer’</p>	
8	<p>Councillor Jamie Treharne: ‘At the recent MTC Planning Committee meeting a question was asked as to why the above doesn’t include the area in and around Kings Wood Gate</p>	<p><i>Comments in relation to additional areas for designation are addressed in response 2</i></p>



	<p>development. Can you please explain why? It is understood that very significant finds were found there during initial works.</p> <p>Also, would it be possible for you to indicate what area have been included in the above? I realise I am asking quite a lot from you and that it is close to Christmas. We have another Planning meeting on the 6<sup>th</sup> January 2020, but I think I would be asking a lot if you could get the answers to me by then. We meet every 2 weeks. It would be great if you could help me out.</p> <p>Many thanks, Jamie. Jamie Treharne (County Councillor For Overmonnow Ward)</p>	
9	<p>Monmouth Archaeological Society:</p> <p>‘Dear Sir/Madam,</p> <p>The archaeological discoveries made during groundworks on the new developments at Parc Glyndŵr and King’s Wood Gate, Overmonnow, have established that the area is rich in prehistoric remains (First Map). Consequently, we wish to suggest that the archaeologically sensitive area be extended to the north and east as shown on the attached map in Yellow.’</p> <p>Additional Comments:</p> <p>‘Dear Heritage Team,</p> <p>Can you please tell me if your archaeological advisors are opposed to extending the archaeologically sensitive areas as we have suggested? I would appreciate a swift response as the Trust Annual General meeting is on the 31st of this month and I am a Member.’</p> <p>‘That's reassuring – many thanks. However, we are still concerned that GGAT might see any extension of the ASA as a problem because they have said there is no need for a watching brief on the Rockfield Road site (just over the hedge from where we have made nationally significant discoveries about the Lake's prehistoric past – a relevant leaflet is attached). They may</p>	<p><i>Comments in relation to additional areas for designation are addressed in Response 2.</i></p>

	<p>feel that they have too much to lose by retreating on this point, but it's vital the ASA is extended to cover the whole area of the Lake.'</p>	
10	<p>Monmouth Civic Society:  'Monmouth Civic Society, after consulting Stephen Clarke MBE FSA of Monmouth Archaeology and Monmouth Archaeological Society, would like to make the following comment on the proposed extension of the Monmouth's Archaeologically Sensitive Area:  The Archaeologically Sensitive Area should be extended to the west of the town to cover the bed and banks of the prehistoric lake that once covered the Monmouth bowl. Please consult Mr Clarke on its exact boundaries.'</p> <p>Additional Comments:</p> <p>'Dear Heritage Team,  Can you please tell me if your archaeological advisors are opposed to extending the archaeologically sensitive areas as we have suggested?  I would appreciate a swift response as the Trust Annual General meeting is on the 31st of this month and I am a Member.'</p> <p>'That's reassuring – many thanks. However, we are still concerned that GGAT might see any extension of the ASA as a problem because they have said there is no need for a watching brief on the Rockfield Road site (just over the hedge from where we have made nationally significant discoveries about the Lake's prehistoric past – a relevant leaflet is attached). They may feel that they have too much to lose by retreating on this point, but it's vital the ASA is extended to cover the whole area of the Lake.'</p>	<p><i>All the archaeological areas within the document have been designated as such by our archaeological advisors, G.G.A.T. Following extensive research and surveys from development works, they have designated the following A.S.A.s. The areas are subject to revision and reassessment.</i></p> <p><i>The area referenced in the consultation response as the 'Lost Lake' and the query of including it within the Monmouth A.S.A. has been discussed with our archaeological advisors. The 'Lost Lake' is considered to be a geological area, which does not meet the requirements for designation as an A.S.A. The designation process comes from the H.E.R. using the recorded finds and known data of the H.E.R. The 'Lost Lake' has the occasional archaeological features, yet, at this time, there are no concentrations of finds within the queried areas.</i></p> <p><i>The information provided on the Parc Glyndwr and Rockfield Road sites has been subject to archaeological assessments. The Parc Glyndwr report (Monmouth Archaeology, July 2014, MA.17.11) noted finds and features. Rockfield Road (Archaeology Desk-based Assessment by Orion Heritage 2017, QU-00216/2 and Land Off Rockfield Road, Monmouth Archaeological Evaluation by Headland Archaeology, July 2013, RRMW13) which evidenced no finds or other archaeological deposits were discovered in the area. This has been referred to in subsequent letters by G.G.A.T. (January 2020 to 2019/0260 and August 2019 to 2016/00870). Based upon this information this area would not meet the requirements of the A.S.A. designation.</i></p> <p><i>Please be aware that the A.S.A. s are subject to reassessment based upon further research and information collated through development work.</i></p>
11	<p>Monmouth Field and History Society:  'Response of Monmouth Field and History Society to the invitation for comments on Monmouthshire County Council's proposed Archaeology in</p>	<p><i>All the archaeological areas within the document have been designated as such by our archaeological advisors, G.G.A.T. Following extensive research and surveys</i></p>

<p>Planning advisory note, September 2019 Monmouth Field and History Society would like to see the Monmouth ASA extended to the area once covered by the “lost lake” lying between the Rockfield and Wonastow roads. We are grateful for the opportunity to comment on the amendments that are proposed to the boundary of Monmouth’s Archaeologically Sensitive Area (ASA). We note that these designations have been created with advice from the council’s archaeological advisers, Glamorgan-Gwent Archaeological Trust (GGAT). The Note acknowledges that archaeological remains vary in age, extent and significance and are a finite resource and that ASAs are considered to have a greater potential for archaeology while accepting that “archaeological remains are not solely confined to these areas”. It restates the National Planning Policy for Wales, that “the aim of the Welsh Government is to protect, conserve and enhance the historic environment for future-generations. It affirms that the historic environment is a non-renewable and limited resource that has a vital and integral contribution to Welsh history and culture” and that “the planning system recognises the need to conserve archaeological remains. The conservation of archaeological remains and their setting is a material consideration in determining planning applications, whether those remains are a scheduled ancient monument or not.” While the Note’s summary says that remains show that people have settled in Monmouthshire from the Mesolithic and Neolithic periods, with finds “predominantly located in the Levels”, we feel it is seriously deficient not to acknowledge the prehistoric discoveries made on the bed and shores of the “lost lake” in Monmouth, including the oldest piece of worked timber found in Wales. Similarly, in the text accompanying the significance of the Monmouth ASA, only the briefest references are made to the town’s prehistoric past. It is hard to believe we are talking about the same town. Considering the weight of evidence of prehistoric activity (documented in “The Lost Lake” by the archaeologist Stephen Clarke mbe, fsa), it seems perverse that the area covered by the footprint of the “lost lake” – has not been included. The report states that “areas considered to have greater archaeological potential or sensitivity may have fewer overall data points”. Bearing this in mind, we feel the site’s context –</p>	<p><i>from development works, they have designated the following A.S.A.s. The areas are subject to revision and reassessment.</i></p> <p><i>The area referenced in the consultation response as the ‘Lost Lake’ and the query of including it within the Monmouth A.S.A. has been discussed with our archaeological advisors. The ‘Lost Lake’ is considered to be a geological area, which does not meet the requirements for designation as an A.S.A. The designation process comes from the H.E.R. using the recorded finds and known data of the H.E.R. The ‘Lost Lake’ has the occasional archaeological features, yet, at this time, there are no concentrations of finds within the queried areas.</i></p> <p><i>The information provided on the Parc Glyndwr and Rockfield Road sites has been subject to archaeological assessments. The Parc Glyndwr report (Monmouth Archaeology, July 2014, MA.17.11) noted finds and features. Rockfield Road (Archaeology Desk-based Assessment by Orion Heritage 2017, QU-00216/2 and Land Off Rockfield Road, Monmouth Archaeological Evaluation by Headland Archaeology, July 2013, RRMW13) which evidenced no finds or other archaeological deposits were discovered in the area. This has been referred to in subsequent letters by G.G.A.T. (January 2020 to 2019/0260 and August 2019 to 2016/00870). Based upon this information this area would not meet the requirements of the A.S.A. designation.</i></p> <p><i>The area located off Watery Lane does have four recorded data spots; two flint tools, Roman potsherds, a piece of undated slag and a Roman brooch. These are not unusual finds for the wider area, and based upon current understanding, this would not meet the requirements of an A.S.A. designation. The small area marked off Jordan Way is not recorded on the H.E.R., and individual data point would not meet the requirements. Please be aware that the A.S.A. s are subject to reassessment based upon further research and information collated through development work.</i></p>
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	<p>covering the same shoreline as where such important prehistoric discoveries were made – should have allowed GGAT to insist on archaeological oversight for the Rockfield Road site application dc/2017/00539. When the application came before the planning committee, the ward member said “an archaeological watching brief would be important on the site” even though GGAT had advised against one. But when it came to a vote the ward member proposed approving the plan without any such condition and it was approved 12-1 with one abstention. This was a true low point in the record of the custodianship of archaeology in Monmouth and we trust the results of the present consultation will avert further damage.’</p> <p>Additional Comment:</p> <p>‘Well, GGAT's opinion will be interesting. They have fought tooth and nail to stop a watching brief being put on the Rockfield Road development site. It will need a sharp about-face for them to extend the ASA to cover the very area they say is worthless archaeologically (even though we all know it covers the lake that finds nearby show was teeming with activity).</p> <p>I would be grateful if you would keep us informed as soon as there is a decision from GGAT.’</p>	
12	<p>Tintern Community Council:</p> <p>‘Your Draft Archaeology Report was discussed by Tintern Community Council yesterday and I can confirm that TCC feel strongly that Tintern is of great archaeological interest and would therefore wholly support your plans to make it an ESA [ASA].’</p>	<p><i>Support welcomed. No additional changes are required in relation to this comment.</i></p>