

Our ref: MON2356/JBHD

ARCHAEOLOGICAL PLANNING



Development Control Manager  
Monmouthshire County Council  
Planning Section  
County Hall  
Rhadyr  
Usk  
NP15 1GA

20th November 2023

Dear Sir

**Re: Demolition of Coach House at Rear of no.31 and Office Building at no.33 Maryport Street and Construction of a New Dwelling: 33 Maryport Street, Usk.**  
**Pl.App.No.:**

Thank you for consulting us about this application; consequently we have reviewed the detailed information contained on your website and can confirm that **the proposal requires archaeological mitigation.**

We have previously commented on applications for this site (2019/01021, 2019/01291 and 2021/01696) in our letters dated 12th August 2019, 11th September 2019 and 25th November 2021, with our understanding of the archaeological resource remaining unchanged.

Information in the Historic Environment Record indicates that the application area is located in an area of archaeological potential, within the Usk Archaeologically Sensitive Area. It is approximately 90m from areas of the Scheduled Monument, Cadw reference: MM155: Usk Roman Site, which relate to the establishment of the fortress during the 1st century AD.

The site is also close to the internal road following the interior of the fortress defences, the Via Sagularis. These roads were also lined by buildings, mainly timber, evidence of which has been found nearby: it is likely the site is within an area of barracks.

As such, an archaeological evaluation was conducted by Avon Archaeology in 2019. The results indicated that Roman and Post-medieval finds and features, including a stone spread, ditch and cobbled surface are located in the development area. The report also notes the unusual depth of the Post-medieval stratigraphy at the site and the apparent lack of medieval remains, which is uncharacteristic of the archaeological resource in the area. The uncharacteristic nature of the archaeological resource on site has been attributed to ground reduction and levelling activity that occurred in the Post-medieval period. However, it cannot be certain that the archaeological remains encountered during the evaluation is typical of the archaeological resource across the remainder of the site. It is possible that further Roman, medieval and Post-medieval remains may be encountered during the proposed development.

As previously, it is our recommendation that a condition requiring the applicant to submit a detailed written scheme of investigation for a programme of archaeological work to protect the archaeological resource should be attached to any consent granted by your Members.

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We envisage that this programme of work would take the form of a watching brief during the groundworks required for the development, with detailed contingency arrangements including the provision of sufficient time and resources to ensure that any archaeological features or finds that are located are properly investigated and recorded; it should include provision for any sampling that may prove necessary, post-excavation recording and assessment and reporting and possible publication of the results. 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:

*The archaeological work must be undertaken to the appropriate Standard and Guidance set by Chartered Institute for Archaeologists (CIfA), [CIfA regulations, standards and guidance | Chartered Institute for Archaeologists](#) and it is recommended that it is carried out either by a CIfA Registered Organisation or a MCIfA level accredited Member [Looking for an archaeologist? | Chartered Institute for Archaeologists](#).*

If you have any questions or require further advice on this matter please do not hesitate to contact us.

Yours faithfully

*Judith Doyle*

Judith Doyle BA MBA FSA MCIfA  
Stewardship Officer