

From:
To: [DCAdmin](#)
Cc:
Subject: Consultation Response 2021/62/91700/W MAC's Truck Sales Ltd, Crosland Road, Lindley, Huddersfield, HD3 3ZA
Date: 01 December 2021 17:33:14
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

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Dear Sir,

Many thanks for your email of 19/11/21.

**2021/62/91700/W Erection of extension to vehicle workshop, engineering operations to excavate and regrade land, formation of extensions to car park and external yard areas, erection of 2.4m high security fencing, external lighting and temporary construction access
MAC's Truck Sales Ltd, Crosland Road, Lindley, Huddersfield, HD3 3ZA**

The Archaeological Assessment make reference to activities within the area of the Class 2 Area of Archaeological Importance which threaten the remaining intact portions of the Roman Road. These are to place topsoil stripped from new car parking within the area of the Roman road, abstract page 3 and to "... establish temporary construction access through this area." section 5 page 21.

Such casual use of a regionally significant archaeological site is not justified and should not be permitted unless an adequate case and appropriate archaeological justification for these activities is made and a clear plan presented. Dumping of modern soil should not be permitted on the line of the Roman road nor in such a way as to obscure or conceal it. If, ultimately, consent for access and dumping of soil is given then there is a potential need for a programme of archaeological observation and recording during this activity.

The Archaeological Assessment covers the recent archaeological evaluations and watching briefs in the vicinity of the site. However the initial evaluation consisted of only 16 trenches over a large site and the trenches were targeted on a small number of geophysical anomalies. This level of evaluation would not be acceptable today as it potentially misses much of archaeological interest. For example more recent evaluations give greater confidence in their findings such as at Yew Tree / Burn Road which located and permitted the excavation of an area of prehistoric activity. This evaluations was based on a 4% sample of the proposed development area.

Previously the WYAAS's recommendations on Crosland Moor have been to carry out further excavation where justified. This recommendation has not always been supported, for example at Peat Ponds Farm (2014/93136).

Although the archaeological potential on Crosland Moor is generally low the construction of the new yard will destroy any archaeological potential in the area to the south of the Roman road, this represents a significant proportion of the remaining undeveloped land in this location. Should permission be granted the WYAAS recommend that this area is subject to archaeological observation and record during development (**an archaeological watching brief**). This can be secured by a condition.

In order to safeguard the remains of the Roman road from inadvertent damage during construction the most sensitive area should be protected by temporary fencing and this protection should be made a condition of any planning consent awarded by Kirklees council. Such a condition was implemented on consent 2014/93136 and is given below.

The West Yorkshire Archaeology Advisory Service welcome the proposals for the improved landscaping maintenance plan at the road junction.

Suggested conditions.

To secure an archaeological watching brief on the development area:

the Department of the Environment's Circular 11/95

"No development to take place within the area indicated until the applicant, or their agents or successors in title, has secured the implementation of a programme archaeological recording. This recording must be carried out by an appropriately qualified and experienced archaeological consultant or organisation, in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the Local Planning Authority."

Or, as an alternative to the above model condition which was first introduced in 1990, the following condition is suggested by Historic England in their Historic Environment Good Practice Advice, Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment, 2015 paragraph 37:

No development shall take place/commence until a written scheme of archaeological investigation (WSI) has been [submitted to and] approved by the local planning authority in writing. For land that is included within the WSI, no demolition/development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

- *The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works*
- *The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI*

To securely fence the extent of the Roman road:

"No development shall take place until fencing has been erected, of a type and in a manner to be agreed in writing with the local planning authority, about the area of archaeological sensitivity confirmed by archaeological survey and no works shall take place within the area inside the fence without the consent, in writing, of the planning authority. The West Yorkshire Archaeology Advisory service should be informed in writing when the fence has been erected."

Best regards

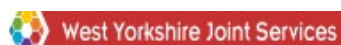
David



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