

Mr Michael Eastham
Arun District Council

Our ref: PL00735643
4 February 2021

Dear Mr Eastham

Re: BN/155/20/EIS - Land North of Barnham Road, Eastergate

Introduction

Thank you for consulting Historic England on the EIA formal scoping opinion in support of an application for a residential development of up to 600 homes and a dedicated bedroom care home at Eastergate, West Sussex.

The site is part of the much larger strategic allocation known as The Barnham, Eastergate and Westergate Development allocated in the Arun Local Plan (Policy SD5). We note that the proposal is deemed to be EIA development but that Archaeology and Cultural Heritage has been scoped 'out'.

Historic environment issues taken in isolation may not be sufficient to justify this development proposal being screened in for an Environmental Impact Assessment. However, as the proposal has been screened in for other topics and that the EIA is devised to consider all potential likely significant environmental effects, then we think it would be appropriate for Archaeology to be scoped in for the following reasons.

Archaeology

The scoping report notes that there is no clear evidence for archaeological remains within the site (14.2.4), but that any buried archaeological heritage assets have the potential to be adversely impacted by construction activities (14.5.1).

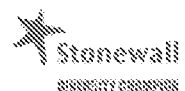
The lack of evidence of archaeology is in this case, most likely to be due to a lack of previous investigation, rather than there not being archaeology present. The site lies broadly within the West Sussex Coastal Plain and it is possible that there could therefore be archaeology present from a range of periods.

At present there is no understanding of the nature of any archaeological deposits that might be expected, their level of importance (national or regional for example), or assessment of what the impact upon them might be. The archaeological potential of the area would be characterised better through diligent desk based assessment.

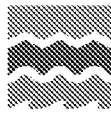


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This is a requirement of the NPPF, which states that where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation (NPPF para 189).

The applicants scoping report concludes (14.6) that 'identified effects' on archaeology (as a result of the development) can be mitigated through further investigation, and that effects on archaeology are considered to be limited and unlikely to result in significant effects. We do not agree with this conclusion.

Should archaeological features be identified within the development area, the impact on them from construction activities could be of a high enough magnitude to result in their total destruction (ie very significant effects). Should archaeology of high importance be identified, there would be a requirement for avoidance of harm, which might translate as preservation of archaeological features or deposits in situ, rather than through archaeological investigation (mitigation for their destruction).

The NPPF para 199 supports this, noting that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted. NPPF para 184, also tells us that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

Position

The archaeological potential of the site is currently unknown, as no baseline assessment has been provided, and as such the projected impacts of the development cannot be adequately assessed.

We therefore think the Environmental Statement should contain a detailed archaeological desk based review to inform understanding of significance and impacts from the proposed development.

This information should also be submitted to support a planning application.

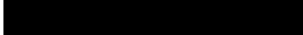
We also recommend that prior to determination of any application for this site, archaeological evaluation would be necessary, the details of which would be advised further by your Archaeological Officer (James Kenny).

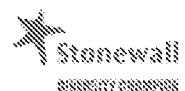
Recommendation

We recommend that Archaeology is scoped in and assessed in accordance with national and local policy guidance and following your expert conservation advice. If

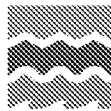


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you have any queries about any of the above, or would like to discuss anything further, please contact me for further advice

Yours sincerely,

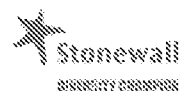
Alma Howell

Alma Howell
Inspector of Historic Buildings and Areas



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