

Application Y/99/13

Land to the North & East of St Marys Church Yapton

Description of Works:

Outline application for 10.5 hectares of residential development (comprising up to 250 dwellings (30% to be affordable) together with ancillary open space and landscaping), 14.9 hectares of public open space development to be laid out as public parkland and landscaped green corridors, vehicular access from Ford Lane (The means of access) - This is a Departure from the Development Plan

West Sussex County Council Archaeology response

Summary:

The Archaeology and Heritage Statement (Strutt and Parker Planning Statement Appendix 3) does not constitute an archaeological Desk Based Assessment as discussed in NPPF paragraph 128, the West Sussex HER has not been consulted specifically regarding this application nor have West Sussex archaeology staff been approached to provide pre-application advice; as it stands the application does not provide sufficient information to establish impact.

- It is recommended that a programme of archaeological assessment and evaluation should be undertaken to provide further information on the likely impact of the proposals upon below ground remains as set out under NPPF paragraph 128. Desk based assessment can support the fieldwork in providing a valuable summary of known information (as held in the West Sussex HER database) but field evaluation will be the most effective means of establishing the extent and importance of any remains and determining an appropriate method of mitigating impact post determination. The field evaluation should take place prior to the determination of the application and before the overall Masterplan and layout has been finalised (to allow the possibility of preservation *in situ* through site layout or foundation design solutions if remains of regional or national importance came to light). If remains come to light, the evaluation results will inform an archaeological Mitigation Strategy setting out the manner in which heritage assets will be protected depending upon their importance.
- If assets of sufficient importance come to light in the evaluation the option of conserving them in place by layout design or engineering solutions should be considered. If the results of the field evaluation reveal archaeological features which are not of regional or national importance (and not appropriate to preserve *in situ*) but which would require more detailed recording and sampling before damage or loss through development, a further stage of investigation will be appropriate, following planning permission, to 'preserve by record'.
- The findings of the evaluation and any further stage/s of recording

(post determination) will be incorporated into written reports which will become publicly accessible through the West Sussex HER. The resulting archive (written report and site notes together with any artefacts) will be deposited in a suitable local museum or other repository.

Suggested Planning Condition (for post-determination archaeological recording)

An archaeological investigation of the site shall be carried out at the expense of the developer in accordance with a specification (written scheme of investigation) to be submitted to and agreed by the Local Planning Authority in writing before the commencement of building works.

Reason : To ensure appropriate investigation and recording of archaeological heritage assets on the site prior to commencement of new building works.

Policies: draft Arun Local Plan (Local Plan 2013-2028) Policy DM 33 Sites of Archaeological Interest, (Arun District Local Plan, 2003: retained Policy AREA17),
NPPF paragraph 169.

Comment/ Recommendation:

The applicants have submitted a Planning Statement which includes as Appendix 3 an 'Archaeology and Heritage Statement'. In section 1 of appendix 3 the Statement cites NPPF paragraphs 128 and 129 and goes on to state (paragraph 2) that:

"This Statement has been prepared using available Archaeological records and previous assessments undertaken for sites nearby as there are no records indicating that the site is likely to have any archaeological interest in its own right (given the longevity of the of its agricultural use and the regularity with which intensive modern ploughing techniques are undertaken) and only part of one boundary (part of the southern boundary) actually abuts the nearest Heritage Asset namely the Church lane Conservation area centred on the listed St. Mary's Church."

In the section entitled 'Archaeology' (paragraphs 13 to 17 of Appendix 3) it is stated that the W Sussex HER had been consulted and that this did not reveal known archaeological features on the application site itself. However, there is no evidence that the HER has been approached to undertake a search relating to this application. It is acknowledged in the aforementioned appendix that the HER is not a definitive database and that other development proposals in the vicinity have produced archaeological evidence where none was previously known. The results of evaluation on land off Goodhew Close and north of Burndell Road (Y/81/10) are referred to in paragraphs 15 and 16 and, finally, in paragraph 17 it is suggested that potential archaeology can be accommodated by means of a condition.

In addition to HER data West Sussex archaeology staff can offer pre-application advice (where resources permit). In such circumstances, we caution enquirers to be aware that the absence of known data within any land parcel may simply reflect the lack of previous field investigation and that "absence of evidence is not evidence of absence". A number

of developments in past years have demonstrated that the coastal plain brickearth can be archaeologically productive even where HER entries are absent and notwithstanding centuries of arable cultivation. Frequently it has been found that archaeological remains can survive some 700mm below present ground level undisturbed by conventional cultivation depths.

The evaluation on land off Goodhew Close and Burndell Road was undertaken prior to determination as was the current development at Courtwick Park. In the latter case, given the scale of the development and pressures to keep to schedule at Courtwick, it would have been impossible to anticipate the level of archaeological mitigation without prior evaluation.

As outlined in the summary, I recommend that a staged approach is the best method to assess archaeological potential and manage risk. In this application the scale of the development merits establishing the archaeological potential by means of field evaluation, rather than a planning condition post-determination. The information provided by the evaluation will enable an archaeological planning condition to be drawn up (should further work be required) which is reasonable, proportionate and appropriate.

For example, once the nature and extent of any archaeology has been confirmed, mitigation measures for the development could include a planning condition setting out a programme of further archaeological investigation and recording (typically a strip, map and sample exercise). This recording would take place before the commencement of construction of any access roads and services and other groundworks/ earth moving on site.

For the field evaluation I suggest excavation by an archaeologist(s) of exploratory machine-excavated trenches, to assess the character, quality, density and extent of surviving ancient features. This should be undertaken in accordance with a written scheme of investigation/ specification approved in writing by Arun District Council. The scope for geo-archaeological deposits or palaeo-environmental deposits should also be assessed at the evaluation stage. Any intrusive works such as geotechnical investigation/ test pitting should be planned so archaeological monitoring can be built in. I would be happy to advise Arun District Council on the suitability of a written scheme of investigation for archaeological evaluation.

M Taylor 6/1/14