

Planning Application APP/20/00990 Havant Thicket, adjacent to Sir George Staunton Country Park, Middle Park Way, Havant

Thank you for your consultation regarding the proposed water reservoir, and extensive development with a direct impact across a large part of a landscape. I would draw your attention to Chapter 8 (Historic Environment) of the submitted Environmental Statement (ES) which I am afraid I cannot fully endorse to you. With regard to the historic environment I will address my comments to archaeological matters and will defer to others, including Historic England, regarding listed buildings and the Registered Park.

The study indicates that there are no designated archaeological sites within the development area and that there is no intervisibility with the three Scheduled Monuments in the wider study area (8.22 and 8.56). The study indicates that there are only two known archaeological sites recorded on the HER, HER 23391 and 34198, within the development area (8.29) however it also notes (8.27) a range of earthworks identified from LiDAR which are presently undated and of uncertain function/origin. The archaeological potential, that is the potential to encounter archaeological sites which are as yet unrecorded, of the site is discussed in paragraphs 8.30 to 8.32. This suggests that there is a moderate potential for prehistoric remains, particularly of Mesolithic date; a moderate potential for Roman remains and a moderate to high potential for post medieval remains – notably those associated with nationally important designed landscape of the Park. The potential for medieval remains is not suggested which is an omission given that the area is associated with medieval defences (the Scheduled castles to the north) and a medieval Chase (which may well have left specific attributes in the landscape and in the archaeological record).

The archaeological impact of an extensive excavated reservoir is undeniably high. However the significance of the impact is regarded in the ES as largely 'slight' (para 8.66) because the value of the archaeological remains likely to be encountered is assessed as 'low'. I am uncertain as to why the significance is regarded as 'low' and not 'low to moderate', given that archaeological remains of Roman date (kilns and occupation) have been found in the study area; archaeological remains associated with the Park are predicted; archaeological remains of Mesolithic activity alongside the streams is suggested and any relatively intact camps might be regarded as of regional significance; and that iron production is suggested by HER 23391 (although this suggested to be post medieval in para 8.62, it is on the HER undated and given the landscape context there is no reason to assume that it is post medieval – for example Roman iron working site was encountered at West Wood to the west). I do not believe that the impact on archaeological remains will prove to be overriding but nor can I offer the comfort that I believe the significance of the impact to be 'slight'. If Roman kilns or settlement, or Mesolithic camp or Roman iron working sites were encountered, or if the earthwork remains of features associated with a medieval Chase were identified, they might be of regional importance. Given the scale of the landscape impacted a range of archaeological remains, some of regional importance, may well be encountered during development.

It is suggested (para 8.79) that the mitigation should be secured through an Archaeological Management Plan (AMP), in turn secured by an archaeological condition. Whilst I am happy to endorse the principle of an AMP I note that the wider range of complex archaeological provision which in my opinion might be needed - to evaluate the site and to address the archaeological recording of archaeological remains impacted by development - the provisions of the AMP as currently set out are not endorsed. They are selectively limited. At present the AMP offers to specifically address 4 bullet points; prehistoric remains, known remains, remains associated with the Avenue and remains associated with the Park. No provision is made for Roman, medieval or post medieval remains. This is reflected in appendix A2.1 of ES volume 4.

The provisions of the AMP should address the need to evaluate for the presence of archaeological remains, including prehistoric (and within that Mesolithic), Roman, Medieval and post medieval remains; mitigation of the impacts of development on archaeological remains (including earthworks) by recording and reporting. Such an AMP would be more complex (and burdensome) than is presently implied by para 8.79 of the ES.

I do not believe archaeology to be an overriding matter and I am happy for archaeological evaluation and mitigation to be secured by the use of archaeological conditions. I would suggest such conditions should explicitly reference archaeological survey, archaeological mitigation and appropriate reporting of results. However given the discrepancy between the level of mitigation which it is my advice is needed in order to satisfy the planning authority that the development can be sustainable with regard to archaeological matters, and the level of mitigation currently suggested by para 8.79 of the ES, I strongly recommend that the planning authority seek some amendment or addendum to the ES from the applicant prior to the determination of the application to confirm that any AMP secured by archaeological conditions will include provision for archaeological remains beyond the prehistoric, the already known and Park related, and will include for example provision for Roman and medieval remains, including earthworks potentially associated with the landscape use as a Chase in the medieval period.

Yours sincerely

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Due to COVID I am presently working from home but can be contacted by email and on the phone number above.