

Dear Ms wells,

Planning Application APP/20/00441 Land west of, Hulbert Road, Havant

Thank you for your consultation. I was disappointed that no Heritage Statement has been submitted with this application, nor any full discussion of the archaeological implications offered in the Planning Statement – the brief statement in para 10.22 offers no insight into the applicant's consideration of the archaeological potential of the site. This despite the pre application advice offered (dated 20/11/2018) – set out below;

“Thank you for your consultation. The site is in an area of relatively low archaeological potential, although this may be a reflection of a lack of past archaeological investigations rather than genuine absence of material. A small archaeological evaluation has taken place in the south west corner of the site that recorded no archaeological features and/or deposits and no further work would be required here. Due to the scale of the proposal there is a chance that as yet unrecorded or unsuspected archaeological features may be exposed by ground working in those areas of the site that remain as green field. What is required at this stage is for further in depth work to be conducted that explores the archaeological potential of the site in detail so that a fully informed decision can be made on a possible archaeological response when a planning application is submitted.

I would therefore recommend that any future planning application should be accompanied by a Heritage Statement that should address any below ground archaeological issues. It should set out the nature of the archaeological potential of the site, the impact previous development may have had upon that potential and the impact on that potential of any future development proposals. The statement should also set out a detailed mitigation strategy to satisfy the planning authority that any archaeological issues that have been identified will be sustainably dealt with during development under the terms of NPPF.”

Wherever possible I would seek to overcome this shortfall within my consultation response. However it is the nature of the archaeological considerations needed in this case (a site visit, map regression to assess past impacts, and assessment of the topographical and geological context) that it is beyond the remit as your archaeological advisor to create the case that is needed and should have been submitted within any Heritage Statement (it would take many hours and so invoke considerable cost to the planning authority to do this). In the absence of a heritage statement the archaeological potential of the site cannot be dismissed. Burnt flint has been found on site (undated but often an indicator of prehistoric or Roman occupation activity) and an archaeological survey to the north at Dunsbury has encountered archaeological material within this landscape.

I am happy that archaeological issues are very unlikely to emerge as overriding and that these matters can be dealt with by use of a condition. I recommend that an archaeological; condition (or conditions) be attached to any planning permission which might be issued to secure an appropriate level of archaeological consideration, survey and mitigation.

If you or the applicant have any further queries, then please do not hesitate to contact me.

Yours sincerely

David Hopkins
(County Archaeologist)

Specialist Environmental Services
Economy, Transport and Environment Department
Elizabeth II Court West, The Castle, Winchester SO23 8UD

Email david.hopkins@hants.gov.uk
0370 779 8025 or 01962 832339 www3.hants.gov.uk/landscape-and-heritage/historic-environment.htm

Share your thoughts on our service here: <http://twitter.com/hantsconnect>