

Houghton, Michelle

From: Hopkins, David (ENV) <david.hopkins@hants.gov.uk>
Sent: 11 December 2019 16:00
To: Havant Planning and Development Mailbox New
Subject: APP/19/01101 Land East Of, College Road, Campdown, Purbrook, Waterlooville

Dear Mrs Haywood,

APP/19/01101 Land East Of, College Road, Campdown, Purbrook, Waterlooville

Thank you for your recent consultation. I would refer you to Chapter 7 of the Environmental Statement, which broadly I would endorse to you. There are three key issues; the impact of the development on the scheduled monument which is on site, Littlepark Roman villa including its associated stretch of Roman road; the impact of the setting of Bevis Grave and Fort Purbrook which are off-site scheduled monuments within the immediate vicinity; and the impact on other archaeological remains which may be on site, recorded and unrecorded.

In the northern part of the development is an important archaeological site, a Roman villa, which has been known about since the early twentieth century and which is a scheduled monument, that is a protected site of national importance. Prior to the pre application discussion the extent of the scheduled area as shown by the scheduling map was discreet, but archaeological survey commissioned by the applicant investigated the area around the known site in an attempt to better define the extent of the site. This has successfully redefined the extent of the Romana villa. Historic England have reviewed the archaeological survey of the villa and have redrawn the extent of the protected area of the monument, and this new area is significantly larger than the previous extent of the scheduled monument. The proposal avoids development on the site of the Roman villa and the elements of the Roman road that is immediately south of the Roman villa. This is welcomed. Housing (and allotments) is proposed around the monument other than to the north which is defied by the northern boundary of the application site (Scratchface Lane). Having taken steps to avoid direct impact on the scheduled monument the impact on the setting of the scheduled monument is a material consideration and is set out in the Environmental Statement. I would defer to Historic England with regard to whether the impact of housing close by and intervening between the villa site and views of the Solent are acceptable. I would also defer to Historic England as to the impact on the setting of the offsite scheduled monuments of Bevis Grave and Fort Purbrook. I note that land to the west of the Roman villa will be subject to development. The site of the Roman villa will be retained as public open space. This gives rise to two issues which need to be addressed, the protection of this site during the construction phase and the management of this site into the future to secure a continuing protection for the site. I do note in the Environmental Statement that general provision is made in 7.4.1 for 'suitable boundary treatments' during construction. Inadvertent damage should be robustly ruled out and I would recommend

that a fencing condition specific to protecting the area of public open space that includes the scheduled monument be attached to any planning permission which might be issued to prevent use of this area during construction, or inadvertent damage through incursion or the passage of heavy vehicles. Para 7.7.6 indicates that the heritage value of the public open space which contains the Roman villa provides an opportunity for the community to increase their 'understanding and awareness'. I recommend that such provision be more robustly secured and that the future management of the Public Open Space should be subject to a management plan that ensures that its role as open space cannot come into conflict with the wellbeing of the monument (such as tree planting or provision of play equipment or ponds or recreational areas) and that the understanding and awareness of the heritage importance of the site should be provided within that plan.

The wider site does have a high archaeological potential, that is a high potential that archaeological sites which are as yet unrecorded will be encountered during development. In particular archaeological evidence of Roman (para 7.5.22) and Iron Age (para 7.5.20) periods, although I would add that such is the importance of the Portsdown Hill during all periods the expression of the archaeological potential of the site should not be needlessly narrowed and the potential for prehistoric evidence should also be anticipated. Some archaeological evaluation has taken place in the vicinity of the Roman villa as part of a pre application need to define the extent of the villa. Other archaeological evaluation has taken place in some other parts of the site during the 1990's. Whilst the results of these early evaluations are illuminating their efficacy to the present circumstances may need to be reviewed. The mitigation by recording is set out in paragraphs 7.6.4 and 7.6.5.

Para 7.6.4 states that loss "... will be offset by a phased programme of archaeological work focused on the southern area. This will comprise further evaluation work to verify and augment the results of the geophysical survey and inform the scope of subsequent archaeological mitigation, which is likely to comprise archaeological excavation, recording and analysis. In the unlikely event that archaeology meriting preservation insitu is identified, this may be achieved by amending the detailed design of the development".

Para 7.6.5 "Details of the scheme of archaeological recording can be agreed with the LPA's archaeological advisors. Given the results of the geophysical survey and archaeological evaluation undertaken, it is considered that such work could be undertaken post consent, secured by planning condition".

I would agree and recommend that archaeological conditions be attached to any planning permission which might be issued to secure; a preliminary phase of archaeological survey (evaluation); a phase of archaeological recording (mitigation of impact including excavation where appropriate); and reporting of the results including publication and sharing the results with the local community. There is merit to addressing those three phases within the wording of three bespoke archaeological conditions.

In summary; I defer to Historic England as to whether sufficient consideration has been given to the scheduled villa site, and the other off site scheduled monuments, within the layout and design; I recommend that archaeological conditions are attached to secure the mitigation strategy suggested in paras 7.6.4 and 7.6.5; that a fencing condition be used to prevent inadvertent damage to the scheduled site during development; and that the long term management of the villa site as public open space is informed/secured within a management plan that ensures that the heritage value of that public open space is protected and accommodated with any other open space roles.

Yours sincerely

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