

Dear Mr Lakhan,

Planning Application APP/24/00405 Pipeline from the reservoir to the north of Middle Park Way to Bedhampton Pumping Station, Meyrick Road, Havant.

Thank you for your consultation regarding the proposed pipeline from Havant Thicket Reservoir to Bedhampton. I would draw your attention to the Environmental Statement Volume 2 Chapter 8, which has been reviewed. I would also draw your attention to Appendix A8.7 the pipeline Archaeological Management Plan (AMP), and to the submitted archaeological Written Scheme of Investigation (WSI) for an archaeological watching brief.

The pipeline will be constructed using bored micro tunnelling with some sections of cut trenching (8.12, 8.29, and with shafts and compound areas (8.29). St Chad's well is avoided, which is welcomed. Para 8.103 indicates that the AMP (A8.7) for the pipeline will be implemented and that this 'may' include use of conditions (para 8.118) and that the AMP describes the use of an archaeological watching brief to mitigate the impacts of the pipeline works. Para 8.120 suggests that there will be no additional impacts in relation to the reservoir itself and that previous mitigation plans remain appropriate. Para 8.121 states that the Pipeline AMP (appendix 8.7) includes the details of the proposed mitigation in relation to the pipeline and compounds.

Para 1.12 of the Pipeline AMP reiterates that much of the pipeline will be micro tunnels. It indicates that there is a 'slight' chance of archaeological remains being impacted by area of shaft and open cut, to which I would add 'and areas of compound', and that a programme of archaeological work is recommended. I would take issue with the term 'slight'. I would refer you to figure 2 of the submitted WSI for the archaeological watching brief which shows the areas impacted. Within the impacted area north of Middle Park Way is HER record 72503 which relates to earthworks of a past field system which is evident on LiDAR, therefore there is a known direct impact on a known archaeological site. Para 1.14 indicates that a watching brief is an appropriate response. Whilst I would largely agree, I would advise that some additional measure of recording (such as earthwork recording and investigation of the date of this field system) will be required to address the earthworks recorded by HER 72503 which will presumably be lost.

Para 1.24 indicates that a WSI for the watching brief will be prepared and submitted, with the recording being commensurate with the provisions of paras 1.27 to 1.31. This is submitted with the present application.

I have reviewed the submitted WSI for the pipeline watching brief. It is my advice that the WSI should also include some provision, beyond just a watching brief, to address the impact on the earthworks of a past field system as represented by HER 72503. Furthermore para 3.1.1 will need some clarification. At present it states that the archaeological work "will take place within agreed constraints". It needs to be clear that these agreed constraints will not prevent the implementation of the provisions of the WSI section 2 and 3, ie) that the constraints to the implementation that will be agreed will not work against the essential aims of the watching brief. On that basis I cannot yet endorse this WSI.

In summary, I agree that there are archaeological implications to the proposal (Environmental Statement Volume 2 Chapter 8 para 8.118) and that some provision for archaeological mitigation is required. I recommend that an archaeological condition be attached to any planning permission which might be issued to secure that archaeological mitigation. I cannot endorse the present WSI as such provision but would endorse the WSI if it contains a more thoughtful provision for managing the impact of the scheme on the earthworks represented by HER 72503 and clarifies that the

constraints referred to in para 3.1.1 would not be of a nature that prevented the implementation of the archaeological provisions of the WSI.

Yours sincerely

David Hopkins
County Archaeologist