

Thank you for your consultation. The site lies within a wider landscape of extensive archaeological activity, with significant remains being identified dating to the later prehistoric and Roman periods. A small portion of the site has been the subject of an archaeological geophysical survey, which identified a number of potential archaeological features including a possible building.

I would draw your attention to the archaeological Desk-Based Assessment (DBA), which was submitted in support of this application (Orion 2021). The document describes the site's archaeological potential as follows (para 5.3):

'...the study site has a high potential to contain remnants of Post-medieval activity, moderate potential to contain Romano-British archaeological finds or features and a low potential for archaeological features from all other periods...'

With regards to previously identified potential archaeological features within the site the document states (para 5.4):

'A possible structure, and pits of unknown date have been faintly detected by resistivity survey within the north and centre of the study site. Therefore there may be below-ground remains of interest in these areas, although the features are yet to be fully investigated.'

The document assesses the general previous impacts within the site as being *'...restricted to general historic ploughing and former land division arising from its use as a pony paddock'* (para 5.6) and that the impacts of the groundworks associated to the proposed development *'is likely to have a damaging impact upon any sub-surface archaeological remains that may lie within the study site'* (para 5.7). If remains are present within the site, the document assesses their probable significance as being *'local to regional'* but *'it is unlikely that any remains would be of national significance requiring preservation in situ'* (para 5.5).

The DBA concludes (para 6.7):

'Archaeology is therefore not considered to preclude or to represent a design constraint on potential development, although should any archaeological remains be present within the site, they would be impacted. A programme of archaeological recording focussing on the potential features detected by the previous geophysical survey would allow appropriate steps to be taken to record and protect any archaeological assets that may be present in the advance of development.'

I support this assessment and broadly endorse the document, however, I believe that a more mature approach to archaeological mitigation should be taken, than is suggested in the conclusion. I agree that archaeology does not represent an overriding concern and that archaeological mitigation can be secured by condition. However, whilst geophysical survey is a useful tool in identifying some substantive archaeological sites, it is unable to identify all archaeological remains and can miss some significant remains. As such, geophysical survey cannot be fully relied on in evaluating the site. Furthermore, the existing geophysics survey only covers a small percentage of the proposed development area (c. 20%). If the programme of archaeological recording is undertaken focussing only on features identified in the existing geophysics survey (as described in para 6.7), it is potentially missing archaeological remains from a significant un-surveyed area of the site. Therefore, I believe it would be necessary for a programme of archaeological evaluation (trial trenching) to be undertaken, followed by a programme of mitigation, if required. I would support the idea that trial trenches could target geophysical anomalies, but would emphasise that this would be most effective if there was a site wide geophysical survey undertaken, covering the whole development area.

As such, I would recommend that the assessment, recording and reporting of archaeological deposits be secured by suitably worded conditions attached to any planning consent that may be granted. For example:

1) That no development shall take place until the applicant has secured the implementation of a programme of archaeological evaluation, in accordance with a Written Scheme of Investigation that has been submitted to and approved by the Planning Authority.

Reason: To assess the extent, nature and date of any archaeological deposits that might be present and the impact of the development upon these heritage assets.

2) That no development shall take place until the applicant has secured the implementation of a programme of archaeological mitigation of impact, in accordance with a Written Scheme of Investigation that has been submitted to and approved by the Planning Authority.

Reason: To mitigate the effect of the works associated with the development upon any heritage assets and to ensure that information regarding these heritage assets is preserved by record for future generations.

3) Following completion of archaeological fieldwork a report will be produced in accordance with an approved programme submitted by the developer and approved in writing by the local planning authority setting out and securing appropriate post-excavation assessment, specialist analysis and reports, publication and public engagement.

Reason: To contribute to our knowledge and understanding of our past by ensuring that opportunities are taken to capture evidence from the historic environment and to make this publicly available.

If you have any further queries regarding this consultation, please do not hesitate to contact me.

Yours sincerely,

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