

**INFRASTRUCTURE SERVICE
ENVIRONMENT TEAM**

DEVELOPMENT CONTROL SECTION

17 MAR 2011

I N T E R

MEMO

O F F I C E

Referred To _____
DATE RECEIVED _____



To: William Hill, Development Control

From: Alison Williams, Historic Environment Record, Environment Team

Ref: PA/2010/1513

Date: 16 March 2011

Subject: Planning permission to erect 14 Dwellings, Land at 91 Barrow Road, Barton upon Humber

The Historic Environment Record

Thank you for consulting the Historic Environment Record (HER) on this application. The HER holds and maintains heritage information for the administrative area of North Lincolnshire. The record is managed and interpreted to enhance the understanding of the historical development of North Lincolnshire as a distinctive place to live and work in, and as an attractive destination to visit. The HER information provides source material for interpretation by heritage professionals, and can also be used by community groups and individuals for research and community activities.

One aspect of the HER's role is to provide advice upon development proposals that affect, or may affect, the sites and settings of heritage assets and the character of the historic environment. These heritage assets may include designated and non-designated historic buildings, monuments, sites and places, including archaeological remains, as well as historic areas and landscapes. This advice is provided in line with national and local policies on the historic environment.

I have checked this application against the HER and confirm that no designated heritage assets are directly affected. My comments therefore relate specifically to non-designated heritage assets of archaeological significance and are in line with Planning Policy Statement PPS5: Planning for the Historic Environment and the accompanying government-endorsed Historic Environment Planning Practice Guide, as well as saved local plan policy HE9. Please note that my recommendations are subject to Ian Goldthorpe's approval and I am copying him in to this memo.

The Proposal and Potential Impacts on Heritage Assets

The applicant undertook an archaeological evaluation of the proposed site in 2008 and has submitted the report of these investigations with this application (Lindsey Archaeological Services, 2008, *Seaforth, 91 Barrow Road, Barton on Humber, North Lincolnshire; Archaeological Evaluation*).

The archaeological evaluation comprised the excavation of sixteen trial trenches across the proposed development site. Significant archaeological remains were recorded in fourteen of these sixteen trenches dating mainly from the mid 8th to the 12th century AD. Over 100 cut features, mainly linear ditches, pits and postholes were recorded, representing a continuation of the Saxon and Medieval occupation remains excavated in 1999-2000 on the neighbouring site at 89 Barrow Road. The medieval Castle Dyke, or town ditch, was encountered running diagonally across the development, cutting through earlier Saxon features. Evidence of metal-working of this date was also found.

The density of archaeological features in each of the trenches was consistent across the site with the exception of the two trenches placed to the south of the existing house where features were absent or truncated by later activity and the construction of the house.

The presence of this archaeology provides further evidence that the Saxon settlement of Barton was not confined to the area of the Saxon enclosure in the immediate vicinity of St Peter's Church, but was clearly much more extensive and probably of a polyfocal nature.

The remains at 89 and 91 Barrow Road are thus of particular significance for the understanding of the Saxon origins of Barton-on-Humber, being located within 100m of the Saxon enclosure and manorial site at Tyrwhitt Hall adjacent to St Peter's Church, as well as relating to the later 12th century town defences and castle erected by Earl Gilbert on the Tyrwhitt Hall manorial site. St Peter's Church and the Saxon manorial site at Tyrwhitt Hall are Scheduled Monuments.

St Peter's Church, and the early settlement of Barton, is nationally and internationally important and has been the subject of a long-running research excavation by English Heritage about to reach publication. The significance of the archaeology at the proposed development site should therefore be seen in the context of its geographical and chronological relationship with these nationally significant heritage assets.

Some of the archaeological remains at 91 Barrow Road were encountered as little as 0.25m below the present ground surface, with an average depth to the surviving deposits of 0.70m. The archaeological impact of the proposed development is thus likely to be seriously harmful. The construction of the proposed dwellings and associated services, which includes two pumping stations, as well as the tree planting and landscaping proposals would result in the destruction and damage of significant archaeological remains, thereby damaging the interests of future archaeological investigations of the site itself and of the other associated nationally important heritage assets.

Historic Environment Record Advice

In view of this potentially adverse impact on significant archaeological remains the application should be accompanied by a Heritage Statement in the Design and Access Statement detailing the design of the foundations and all other groundwork associated with the proposed construction, and assessing the likely heritage impacts and potential for mitigation. Although the applicant has submitted the results of the archaeological trial trench evaluation, the archaeological impact of the development is not referred to in the Design and Access Statement, nor does it include any proposals to mitigate the likely significant harm to the heritage asset. It is surprising, given our earlier involvement with the evaluation, that the HER has not been involved in the pre-application discussions.

Without this information, the planning authority is not in a position to make an informed and reasonable decision on the application in line with the national and local policies. The requirement for the submission of this information is set out in PPS5 policy HE6.2; policy HE6.3 states that '*Local planning authorities should not validate applications where the extent of the impact of the proposal on the significance of any heritage assets affected cannot adequately be understood from the application and supporting documents*'. Local plan policy HE9 also requires adequate archaeological assessment to be submitted.

The applicant should therefore be advised to submit the required information in the form of a Heritage Asset Impact Assessment report that assesses the impact of the proposed construction on the significance of the archaeological remains. This information will enable the planning authority to consider the application in relation to other relevant policies in the PPS that guide the determination of applications relating to heritage assets, including policies HE7.1, 7.2, 7.4; HE8 and HE12.

Where remains of archaeological significance will be affected by the proposed development, then appropriate mitigation measures should be drawn up to conserve them (PPS5, HE7.2). This may include avoiding or minimizing disturbance to areas of significance, if necessary by modifying the layout and/or the design of the proposals, including for example the design of foundations.

Where loss of heritage assets as a result of development is considered justified, the PPS requires that '*local planning authorities should require the developer to record and advance understanding of the significance of the heritage asset before it is lost, using planning conditions or obligations as appropriate*' (PPS5, HE12.3). The PPS also states that the results of these investigations should be made available and the archive deposited in a suitable repository.

Given the significance of the remains on the proposed development site, such archaeological recording would need to provide for detailed pre-construction excavation and recording, followed by a programme of post-excavation assessment and analysis, the publication of results in appropriate format and the archiving of the site artefacts and records.

Mitigation proposals including any necessary layout or design amendments or a programme of archaeological recording, should be submitted with the application

in the form of a detailed Written Scheme of Investigation (WSI) for consideration by the planning authority prior to the planning determination. Requiring the production and submission of a WSI is in accordance with PPS5 policy HE12, and paragraphs 131 and 140 of the PPS Practice Guide. This is to ensure that all parties understand the archaeological requirements.

Paragraph 140 of the Practice Guide states that *'To secure effective implementation after the decision is made it will be important to finalise the content of the written scheme of investigation prior to determination. This will ensure that the developer is fully aware of the extent of the commitment before implementing the consent.'* This principle of ensuring that appropriate and satisfactory provision for recording is made is also set out in saved local plan policy HE9.

Historic Environment Record Recommendation

The PPS underlines the importance of clarifying the archaeological issues relating to this application before any planning permission is granted. Until a Heritage Statement providing a detailed archaeological impact assessment and mitigation proposals, including a WSI, is produced, I am therefore registering a **holding objection** to the application.

The preparation of this documentation need not be a lengthy process and could be comfortably achieved within the determination period before the 30th May. If the required information cannot be made available within this timescale the applicant could be advised to withdraw the application with a view to resubmission once the information is available.

If the applicant does not submit this information, and if for any reason the planning authority has to determine the application in its present form, the application should be **refused** as it is contrary to national and local policies PPS5 and HE9 respectively; inadequate information has been provided to allow the Local Planning Authority to assess the impact of the development on the archaeological significance of the site, or to approve an appropriate mitigation strategy.

If the planning authority is minded to accept this advice, I would be grateful if you would inform the applicant of the requirement to submit the Heritage Statement at the earliest opportunity. I would be pleased to provide the applicant with further advice about the content of this and mitigation options.

I trust this recommendation is acceptable.

Alison Williams
Historic Environment Officer