

From: William Kelly <William.Kelly@leics.gov.uk>
Sent: 22 March 2024 11:35
To: Alex Jelley
Cc: Planning Folder New; Richard Clark
Subject: 24/00083/HYB | Land At Burbage Fields Farm Bullfurlong Lane Burbage - Response to Applicant's Letter

Dear Alex,

24/00083/HYB | Hybrid planning application for 422 dwellings, public open space, associated infrastructure and the demolition of 65 and 65a Coventry Road, and Burbage Fields Farm and outline planning application for a residential care home and up to 11no. self-build plots (all matters reserved except for access) | Land At Burbage Fields Farm Bullfurlong Lane Burbage

Archaeological Comments

Thank you for your re-consultation on the above planning application. Having considered the applicant's written response to our comments, and in light of the recently submitted geophysical survey (05/03/2024), we would repeat our previous recommendation for pre-determination evaluation trial trenching. Without the information that such an evaluation would provide it would be difficult in our view for the planning authority to sufficiently assess the archaeological impact of the proposals. We appreciate that as the site has been under pasture for a number of years, and given the time of year, a programme of fieldwalking would however not be viable/productive, and would therefore revise our previous comments in this respect.

We would reiterate that currently we do not have a good understand of the potential for, and significance of, any archaeological buried remains present within the site. The desk-based assessment (DBA) has identified a low-moderate potential for remains of Bronze Age, Iron Age and Romano-British date to be present. Due to the paucity of available data in the vicinity, we believe the conclusions drawn within the DBA regarding the archaeological potential of the site are based upon an inadequate level of information, and has underplayed the overall baseline potential. Our expectation is that considering the positive archaeological results arising from investigations within the wider landscape (including those to the immediate north of the site) the potential is likely to be high for later-prehistoric and Roman remains, rather than low-moderate. Indeed the submitted geophysical survey has identified potentially archaeological anomalies situated in the field (3) immediately south/southwest of a previously identified Roman agricultural site, in addition to a possibly prehistoric ring ditch identified through aerial photography and further Roman and Anglo-Saxon remains recovered through metal detecting.

We do not agree that 'the archaeological evidence baseline is sufficiently robust to demonstrate that there are no archaeological remains present at the site which are so important that they would warrant refusal of planning permission to develop the site for housing', as stated in the applicant's letter. The significance of the buried remains determines the most appropriate archaeological response and the consequent implications for the development, the assessment of which cannot be determined without the further information intrusive investigation (trial trenching) would provide (extent, date, character and nature of archaeological remains). Therefore, although the site contains a high archaeological interest, currently there is little clarity or recognition regarding the significance of these remains.

Furthermore, refusal of an application is not the only reason for undertaking pre-determination evaluation. As you will be aware, it is the responsibility of the applicant to describe the significance of any heritage assets likely to be affected by the proposals (NPPF para 200), where necessary including a field evaluation (and in this instance it is our opinion that this is the case). In the absence of sufficient understanding of the extent and significance of the archaeological buried remains, the implications of the proposals upon the historic environment cannot be adequately assessed and the applicant and planning authority cannot discharge their responsibilities to seek ways to minimise or avoid conflict between any affected heritage assets and the development impact.

The applicant has submitted a geophysical survey for the site, which is welcomed, although the results of this work are largely inconclusive. Medieval to post-medieval ridge and furrow remains detected throughout the survey area and scattered ferrous/magnetic debris are likely to have obscured potential archaeological anomalies. Additionally, there are issues regarding the masking nature of the prevailing local geology, a problem commonly encountered across the border in Warwickshire, where higher percentage trenching samples are generally requested as standard. Trial trenching and excavation of a Roman agricultural site to the northeast of the application area revealed more extensive remains than was previously indicated by the geophysical survey results, for example. In addition to the site-specific issues, it should also be noted that as a general rule not all types of archaeological deposit (including prehistoric remains, Anglo-Saxon and human burials) are particularly sensitive to detection through geophysical survey.

We do not believe that the results of the Field K investigations can be used to substantiate the survey results across the remainder of the site. The trial trenching in Field K confirmed an absence of archaeological remains, as indicated in the geophysical survey results. It is unclear however whether the geophysical survey would have identified buried remains had they been present, as the geophysics in Field K did not identify any anomalies with a possible or probable archaeological origin that were subsequently tested and not present in the trial trenching. Field K is considerably smaller than the remainder of the development area, and further from the areas of heightened archaeological potential (areas of sand and gravel and areas closer to the known sites/finds to the north). Whilst not being particularly conclusive, the wider survey has indicated the presence of three separate clusters of sub-surface anomalies within Fields 3 and 8 of the surveyed area, which have been identified as being possibly archaeological in origin.

For a site of this scale with an archaeological interest and without a clear understanding of significance, we would recommend that intrusive investigation should be carried out in order to minimise risk to both the archaeological resource and to the applicant, and to assist in the making of an informed and balanced planning decision. Moving directly to a conditioned approach without an adequate understanding of the archaeological implications has the potential to cause issues later on with regard to the management of the archaeological resource, as well as implications for the delivery and viability of the scheme (in the case that large exclusion zones or extensive excavation areas are required). As such our preference would be for a comprehensive programme of trial trenching prior to determination, to establish a good understanding of the archaeological resource through testing any geophysical anomalies, in addition to any geophysically 'blank' areas.

I hope this clarifies our position, please do not hesitate to get in touch if you have any further queries. As always, we are happy to discuss the scope of the evaluation further with the applicant's archaeological consultant, if this is preferable to the LPA.

Kind Regards,

William

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