

Altman, Rebecca

Subject: FW: Consultation, 20/01257/OUT Farlington Water Treatment Works

From: Historic Environment <historic.environment@hants.gov.uk>

Sent: 04 January 2021 14:21

To: Farr, Oliver <Oliver.Farr@portsmouthcc.gov.uk>

Subject: RE: Consultation, 20/01257/OUT Farlington Water Treatment Works

Dear Ms Altman,

Consultation, 20/01257/OUT Farlington Water Treatment Works

Thank you for your consultation. I would draw your attention to the Heritage Statement submitted with the planning application, which I would not endorse to you. It has, in my opinion, two short comings. In the first instance the Heritage Statement is based on the archaeological information held within the Hampshire HER. However the site sits within Portsmouth City and its more immediate location is addressed by the Portsmouth HER which appears not to have been consulted. The Portsmouth HER records an archaeological evaluation associated with the construction of Farlington Reservoir (EMP49). I understand this potentially suggests the presence of Bronze Age burial activity. In consequence the archaeological potential of the area is more complex than presented. The second is that the Heritage Statement acknowledges the impact of temporary compounds, but does not describe those impacts, nor their archaeological implications which undermines the Heritage Statement conclusion that no further archaeological work is required.

The executive summary states "There is moderate potential for archaeological remains associated with the Iron Age period, however archaeological remains in the location of the proposed building have most likely been severely truncated by subsequent redevelopment in the 20th century and therefore there is considered to be low survival potential." I would concur in so far as the proposed building lies in an area where there is already a developed basin. However Section 5.1 states "Based on the assessment, there is moderate potential for archaeological remains associated with the Iron Age period and low potential for archaeology from other periods. However archaeological remains have most likely been severely truncated by subsequent redevelopment in the 20th century and therefore is considered to have low survival potential," (repeated in summary 7.1) and in doing so unattaches the impact of 20th century development from the 'site of the proposed building' to a more general 'whole development' statement. If taken to apply to the whole site, this has not been substantiated.

Section 6 states "Impacts may arise from temporary enabling works associated with the construction ..." and the submitted site plan shows a construction laydown area to the north west, a construction compound to the south and a construction car park to the south east. These all appear to be previously undeveloped areas of the site. The assertion that they have been impacted by 20th century development (section 5.1) needs to be substantiated if to be given any weight.

As a consequence section 7.2. Recommendations states " Given the limited impacts, no further works are recommended, as mitigation is not needed." I cannot endorse this conclusion. There appear to be at least three construction related impacts in open areas of the site not apparently previously truncated by 20th century development. The archaeological implications of these impacts needs to be assessed.

I do recognise that, allowing for a moderate archaeological potential arising from the Iron Age and Bronze Age material alluded to in the Heritage Statement, and the Bronze Age evidence in the Portsmouth HER but not alluded to in the Heritage Statement, that archaeology is unlikely to be an overriding issue. I hope that the applicant will be able to offer a revised Heritage Statement but in the event this is not possible prior to the determination of the planning application,

I recommend that an archaeological condition is attached to any planning permission issued to secure appropriate archaeological mitigation, the nature of this yet to be described in light of the reassessment of the archaeological implications of development.

Yours sincerely

David Hopkins
County Archaeologist

Hampshire County Council
Economy, Transport and Environment Department

Telephone 0370 779 8025

Due to COVID I am presently working from home but can be contacted by email and on the phone number above.

From: Farr, Oliver <Oliver.Farr@portsmouthcc.gov.uk>
Sent: 17 December 2020 18:43
To: Historic Environment <historic.environment@hants.gov.uk>
Subject: Consultation, Farlington Water Treatment Works

Good afternoon,

Please see attached consultation request.

Regards

Oliver Farr
Technical Validation Officer
Directorate of Regeneration
Planning and Economic Growth
Portsmouth City Council
Civic Offices
Guildhall Square
Portsmouth PO1 2AU

This email is for the intended recipient(s) only.

If you have received this email due to an error in addressing, transmission or for any other reason, please reply to it and let the author know. If you are not the intended recipient, you must not use, disclose, distribute, copy or print it.

This email may be monitored, read, recorded and/or kept by Portsmouth City Council. Email monitoring and blocking software may be used.
