

Archaeological Consultation Response

WSSC/021/23

Recycle Southern Ltd, Elbridge Farm Chichester Road, Bognor Regis, PO21 5EF

Regularisation, consolidation and extension to the existing waste transfer facility including an increase in throughput of waste.

Recommendation

No objection, subject to a planning condition to secure archaeological mitigation measures through a Written Scheme of Investigation for archaeological investigation, recording, and reporting.

Policies: National Planning Policy Framework (2019) para. 205; West Sussex Waste Local Plan (April 2014), Policy W15: Historic Environment, and Strategic Objective 10: To protect, and where possible, enhance the natural and historic environment and resources of the County); Arun District Local Plan 2011-2031, Policies HER DM6 (Sites of Archaeological Interest) and HER SP1 (The historic environment).

Comment

The site lies within an area of high archaeological potential, as indicated by archaeological notification area (ANA) DWS8448; Multi-Period Site, North Bersted. Multi-period activity has been recorded within the vicinity of the Site dating from the Mesolithic and Neolithic periods onwards. The heritage statement submitted in support of the application indicates a high potential for remains of local, regional and potentially national significance; the latter indicated by the presence of the North Bersted late Iron Age warrior burial within the study area. The heritage statement states that, *"It is considered likely that further such remains will exist within the area of the proposed extension to the existing site, which may be negatively impacted by any associated groundworks."*

The proposals for expansion of the existing waste recycling facilities include expansion into land which is undeveloped and currently under arable cultivation. The proposals will entail relatively non-intrusive groundworks, with efforts made by the applicant to minimise impacts to any below-ground archaeology which may be present within the extension area. It is acknowledged that installation of posts to support the block walls, and new perimeter fencing, will not amount to a substantial impact to buried archaeology. It is proposed that existing plough soil will be left *in situ* to minimise impacts within the extension area of the Site. However, I remain concerned that there will not be meaningful long-term protection for any buried archaeology within the extension area. Impacts such as unintentional removal of plough soil/overburden during movement of materials; compaction and erosion and wheel rutting from plant movement have the potential to amount to significant cumulative impacts over time. Figure 12 of the heritage statement gives an indication of the potential ongoing impacts of operations upon retained plough soil and, by extension, any archaeological features underlying it. Given the acknowledged potential for archaeological remains of high significance, in this case the proposed mitigation measures of minimally intrusive groundworks are not likely to be sufficient to mitigate the risk of harm. There is also potential for impacts to buried archaeology arising from topsoil stripping in advance of bund creation, as well as the proposed road widening.

It may be feasible to ensure the preservation *in situ* of any buried archaeological remains present within the extension area of the Site by taking measures to protect the existing ground surface.

Protection from compaction, rutting and removal of overburden might be achieved by laying appropriate protective surfacing, if conducive to the operational requirements of the facility.

In the absence of such measures, an appropriate and proportionate programme of archaeological work will be required to identify any archaeological features present within the extension area, and if applicable mitigate against loss or harm to such heritage assets. I therefore recommend a pre-commencement condition for production of a Written Scheme of Investigation for a programme of archaeological work.

The proposals will not result in harm to the significance of Elbridge Farm. The historic farm buildings are non-designated heritage assets, but the current site use as a recycling facility means that the Site does not make a positive contribution to their setting. The proposals, whilst comprising a small change within the setting of the assets, will not amount to additional harm to the significance of the assets.

Proposed condition

In the absence of measures to protect the existing ground surface from ongoing operations on site, I would recommend a pre-commencement condition, worded as follows:

Planning Condition (Archaeology)

No development shall be carried out (including any demolition and site clearance) until:-

Part 1- a written scheme of investigation for a programme of archaeological work has been submitted to and approved by the County Planning Authority. The scheme should include provision for field survey recording the analysis reporting publishing and archiving of the results.

Part 2 - Once approved, the scheme of archaeological work shall be implemented in full in accordance with a timetable to be agreed within the scheme.

REASON: In order to ensure that heritage assets of archaeological interest will be adequately recorded before development and subsequently will be adequately reported.

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Kind regards,

Chloe

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