

Stacey Robins
Development & Building Control
Wealden District Council
Vicarage Lane
Hailsham, East Sussex
BN27 2AX

Date
28th October 2021

Our Reference: AR WD21 2198 Bird Eye Farm Framfield defer
For the attention of: Claire Turner

Dear Mr Robins

ARCHAEOLOGICAL CONSULTATION

WD/2021/2198/MAO. LAND AT BIRD IN EYE FARM, SOUTH OF BIRD IN EYE HILL, FRAMFIELD, TN22 5HA.
OUTLINE PLANNING APPLICATION FOR THE ERECTION OF UP TO 290 DWELLINGS, ASSOCIATED LANDSCAPING, INFORMAL OPEN SPACE AND STRATEGIC SANG, WITH ACCESS FROM THE B2102.

Recommend for refusal due to insufficient information	The applicant has failed to meet the requirements of section 194 of the NPPF and it is not possible to clarify the impact of the proposal on heritage assets or archaeological remains	YES
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Relevant National Planning Policy

194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Detailed Comments:

The proposed development is not currently located within an Archaeological Notification Area and very few archaeological investigations have been undertaken locally. However, evidence of past human activity in the wider area exists from prehistoric, Roman, medieval and post-medieval periods. Evidence of iron working activity is present in close proximity to the site and the watercourses that cross the site and lie along much of the western site boundary may have influenced the location of such activity.

The application includes an *Archaeological Desk Based Assessment* (DBA) (RPS report JAC26369 dated April 2021) which acknowledges the lack of intrusive archaeological investigation within the site and wider study area and is forced to conclude that the site's archaeological potential is somewhat uncertain. I also note that no site visit appears to have been undertaken and that the East Sussex Records Office was not visited in the production of the DBA which is not in accordance with industry standards, but perhaps the result of Covid restrictions and record office closures at the time the report was being produced. However, no such restrictions were in place in the months leading up to the application being submitted so these omissions could, perhaps, have been avoided. The illustrated study area also appears off-centre in relation to the application boundary resulting in the search radius of Historic Environment Record data varying from 1km (to the north) to 0.3km (to the south). A number of records are therefore omitted from the DBA but I find that these only relate to medieval and post-medieval farmsteads so would not add greatly to the discussion of the sites archaeological potential as it is acknowledged in the report that evidence of agricultural cultivation dating from the Medieval period onwards is anticipated to be present.

In the light of the limited conclusions that can be reached from desk-based research alone on a site that lies in an area of very limited recorded archaeological evidence it is my opinion that it is important to follow the requirements set out within **NPPF** (the Government's planning policies for England) and ask the developer to undertake an archaeological field evaluation to clarify the archaeological significance of the site, especially in relation to iron working/production. This evaluation should be undertaken **before** the application for planning permission is decided, so that archaeological issues can be fully considered when the planning decision is made

We would expect the evaluation to comprise a combination of geophysical survey and targeted trial trenching where warranted.

The purpose of the evaluation would be to:-

- i) Establish the presence/absence of archaeological remains within the proposed application boundary.
- ii) Determine the extent, condition, nature, character, quality and date of any archaeological remains present.
- iii) Establish the ecofactual/environmental potential of archaeological features.

And then, should archaeological remains be discovered:

- iv) Appraise the likely impact of the development proposals on any archaeology located.
- v) Prepare a mitigation strategy which states how the archaeology of the site is to be accommodated within the proposed development, either by preservation *in situ* or

by record (i.e. through excavation, recording and publication) if this is considered necessary or appropriate.

We can issue a formal brief on request.

This application is also supported by a *Heritage Statement* relating to built heritage (RPS report JACH01067 date April 2021). We will defer to the local authority conservation office on all matter relating to the proximity of the site to a number of designated Listed Buildings.

This advice is provided to the Local Planning Authority by the County Archaeologist in line with the Service Level Agreement and is not a statutory consultation response.

We would wish to make further archaeological recommendations once this field investigation has been carried out and submitted to the LPA.

Meanwhile, please do not hesitate to contact us again if you need further information or advice.

Yours sincerely

Neil Griffin

County Archaeologist
Archaeology Section
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East Sussex County Council

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