

My ref:
 Your ref: 13/00384/FUL
 Date: 17th June 2013
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Mr. Nick Harding
 Development Management
 Planning Services
 Peterborough City Council

Economy, Transport & Environment
 Executive Director Alex Plant

Historic Environment Team
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 Cambridge
 CB3 0AP

Dear Mr. Harding

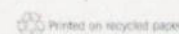
re: 13/00384/FUL – Fenland Place Land To The North Of Barsby Cooked Meats, Northey Road, Peterborough; part retrospective application

In response to your request to us for archaeological advice for the above planning application please find our comments below.

Background

This proposed development area lies in a well known archaeological landscape to the north of the River Nene in the Peterborough eastern fenland. Known nationally to archaeologists as the Flag Fen Embayment, named after the Bronze Age waterlogged platform and causeway site located roughly 0.5km to the north-west, the site lies on the western landfall of Northey - at the prehistoric fen edge on the east side of this former wetland area. The area is presently managed fenland via pumped drainage systems that are in place to control flooding within the cultivation fields that form part of the open fen landscape character for the area (cf Peterborough Landscape Character Assessment, 2007).

The Flag Fen Bronze Age site and associated archaeological remains were designated as a scheduled monument in 2012 (National Heritage List for England ref no: 1406460) in acknowledgement of the national importance of the remains present in this location. Forming a contrastive wetland archaeological character to the dry land archaeological settlement sites excavated in advance of the industrial development at Fengate since the 1970s, Flag Fen contains associated archaeological deposits known to occur in important wetland locations in a small number of locations in North-West Europe - such as votive deposits of metal weapons and tools, disarticulated human remains, raised platforms and causeways across rivers and marsh. These remains, which are in part under a managed preservation in situ scheme and partly open to the public in one of Peterborough's tourist attractions, draw significant numbers of UK and international tourists and researchers each year. English Heritage have acknowledged the importance of the site and its broader location in this designation, and provide recommendations and advice on the management of the monument in its landscape, extending and supporting the provisions that the landowner had previously made towards the site, wherein groundwater levels were kept as high as possible in the wetter, deeper, parts of the site catchment area.



Where excavations have occurred within the Flag Fen Embayment or at its edges - where land forms rose to a elevations well above ambient groundwater levels and were locations for dry land activities such as settlement, cultivation and industrial task sites – further regional and nationally important sites have been found.

The most recent discoveries in the embayment have occurred at Hanson's Must Farm Quarry in Whittlesey, Cambridgeshire, in which the southern edge of the Flag Fen Embayment and former course of the ancient River Nene were found. Here, well-preserved raised settlement platforms, causeways, wetland votive hoards and 8 waterlogged boats were found buried beneath thick layers of peats and silts. Similar important prehistoric remains were found in a field evaluation at the south-western side of the embayment to the east of Stanground in proposed economic development land, and were also found to extend southwards beneath the new residential development, and in particular the course of the A605 link road.

Given the presence of significant heritage assets in the locality and those that have been described by Rebecca Casa Hatton in her advice to you, it is likely that archaeological remains of as yet unknown significance will be located in the proposed development area

National and Local Policy

The **National Planning Policy Framework (NPPF)** published in 2012 advocates policies for sustainable development, listing "an environmental role - contributing to protecting and enhancing our natural, built and historic environment" as one of three stated dimensions to sustainable development (paragraph 7, page 2). If historic environment matters have not been taken into consideration within a planning proposal, the development cannot be deemed to be sustainable.

NPPF contains the section *Conserving and enhancing the historic environment* (Section 12), which provides specific policy advice for the historic environment and includes advice to local planning authorities, developers/applicants and their agents on the need to consider the impact of a proposed development on the significance of a designated heritage asset – "significance which can be harmed or lost through alteration or destruction of the heritage asset or development within its setting" (paragraph 132, page 31).

English Heritage has provided guidance on the ***The Setting of Heritage Assets*** (English Heritage 2011). Within this advice it is stated that:

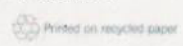
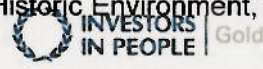
"the cumulative impact of incremental small-scale changes may have as great an effect on the *setting* of a heritage asset as a large-scale development".

Peterborough Landscape Character Assessment (2007) states:

"The measure of landscape continuity is derived by examining the scale and age of the landscape scale (small at the bottom to large at the top) - the assumption being that small scale agricultural landscapes tend to be more sensitive to change than their larger scale counterparts."



The adopted **Peterborough Core Strategy (PCS)** contains policy advice for the historic environment under Policy CS17 The Historic Environment, in which it states:



"The Council will protect, conserve and enhance the historic environment throughout Peterborough, through the special protection afforded to listed buildings, conservation areas and scheduled ancient monuments and through careful control of development that might adversely affect non-scheduled, nationally important archaeological remains; other areas of archaeological potential or importance; historic features and their settings; buildings of local importance; and areas of historic landscape or parkland (including, but not limited to, those on the English Heritage Register of Parks and Gardens of Special Historic Interest)."

"All new development must respect and enhance the local character and distinctiveness of the area in which it would be situated, particularly in areas of high heritage value.

There will be particular emphasis on the following:

the avoidance of harm to the character and setting of Burghley Park, Milton Park, Thorpe Park, and the grounds and parkland associated with Bainton House, Ufford Hall, Walcot Hall and the Abbey Fields, Thorney."

(to which Flag Fen may now be added, since its designation (2012) is dated after the date of adoption of this policy (2011)).

The PCS also states at 6.11:

"The protection, conservation and enhancement of Peterborough's historic environment is an integral part of the future strategy for the area. This is particularly important for a location which will experience substantial pressures for growth, because such growth will only be truly sustainable if it acknowledges environmental considerations."

And at 6.12.5:

"Although Peterborough has a number of successful tourist attractions, it is not always seen as an obvious tourist destination and is often left competing against neighbouring areas and cities such as Cambridge. The latest Regional Tourism Strategy proposes joining six neighbouring authorities to create a Greater Cambridge and Peterborough Tourism Confederation; this will enable Peterborough to exploit the reputation of Cambridge through joint marketing strategies, in a more coherent way. The emerging Heritage Strategy continues this theme of collaborative working between key heritage sites within the city and surrounding areas."

For Policy CS18 Culture, Leisure and Tourism

"The existing cultural, leisure and tourism facilities will be protected and enhanced."

Taken together, the policy and guidance offered on the impact of development or land use change upon the historic environment, heritage assets and their settings indicate that local planning authorities must consider the level of harm not only to the heritage assets that may be found in or at a place, but also to the setting of the asset. NPPF states that "great weight should be given to the asset's conservation. The more important the asset the greater the weight will be" (para 132, p. 31). Flag Fen's setting is compromised on its western and southern sides by existing and approved large scale developments, including one for which permission was granted

in 2009 – before the designation of Flag Fen as a scheduled monument. Its remaining vistas and links to the great fenland basin in which it is located should be protected from creeping piecemeal developments which have the ability to erode the character and setting of ancient monuments. To protect the setting of Flag Fen would be compliant with both local and national policy.

The Planning Application

The contents of the planning application and the supporting material (plans, descriptions) are inconsistent. This matter is brought to your attention as they relate to ground impacts, which are important areas of archaeological consideration with any planning application and regarded as specific to the application boundary.

- **Section 6** (Pedestrian and Vehicle Access, Roads and Rights of Way) indicates that no new vehicle and pedestrian access will be required by the new development, although the supporting plans clearly show a large access road into the proposed development area (eg Architectural and Surveying Services Ltd Dwg OS04 dated 15/03/13).

Further to this, in view of the proximity of the site to a designated archaeological site for which the setting of the monument should be considered:

- **Section 9** (Materials) indicates that the boundary treatment will be: “Close boarded 1.8m high fence with additional planting for screening (see submitted details). Materials and landscaping to be discussed with the planning authority.” This would replace an existing post and wire fence with a hedgerow boundary (see below).
- Section 9 also indicates that *existing* access materials are of chippings and grass. As there is no indication of any existing access either on the Ordnance Survey map or current aerial photographs, or on the supporting existing location plan for the application (eg Architectural and Surveying Services Ltd Dwg OS01, dated 15/03/13). As such this statement should be discounted.

I understand from the pre-application supporting document entitled “SUPPORTING PLANNING POLICY STATEMENT FOR PROPOSED STATIC CARAVAN AND 2 TOURING CARAVANS WITH THE ERECTING OF A FACILITIES BLOCK AND RELOCATION OF PERMITTED STABLES FOR ONE EXTENDED GYPSY / TRAVELLER FAMILY AT NORTHEY ROAD, PETERBOROUGH, PE6 7YX” that a planning application for a stable block at this location is currently pending consideration, but as this application has not yet been determined it must be assumed that no permitted access is currently in place.

- I understand that the foul sewage will be disposed of in a package treatment plant (**Section 11**) and that:
- a SUDS scheme is planned for the site, along with an expectation that surface water will be drained via an existing water course (**Section 12**). However, no details or plans have been submitted that enable an in depth assessment of the groundworks to occur.
- **Section 15** (Trees and Hedges) indicates that there are no existing hedges on the site, which is conflict with Section 9 above. Both north and south boundaries are known to have a hedged border.

In view of the contradictory nature of the planning application and a lack of important design detail, my advice is that it is not possible to determine this application and that it should be refused.

I recommend that the applicant is encouraged to secure an alternative location in a more favourable/less sensitive area, and advise that pre-application advice is sought from the archaeological adviser to the local planning authority in order to achieve this.

In the light of national and local policy advice, and guidance on the settings of heritage assets, as well as on culture, leisure and tourism I recommend that any application for piecemeal development is refused in the locality of the nationally important remains at Flag Fen in order to preserve the landscape context in which they are located.

Yours sincerely,

(By email)

Kasia Gdaniec
Senior Archaeologist



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