

Statement of Common Ground - Archaeology

Site Address: Land Between Humber Doucy Lane and Tuddenham Lane, Ipswich, Suffolk

Date: 04-12-24

Background

1. The proposed development was refused planning permission by IBC and ESC (under planning application reference IP/24/00172/OUTFL and DC/24/0771/OUT) by way of Decision Notices dated 4th June 2024.
2. SCC, ESC and IBC are of the view that this large development proposal is situated within an area of very high archaeological potential recorded in the County Historic Environment Record (HER). Geophysical survey (AOC Archaeology, 2023) has shown several areas of previously unknown and dense archaeological anomalies which suggested that there could be more archaeological remains that were not detected. However, this site had never been the subject of systematic below ground archaeological investigation and there is high potential for further unidentified archaeological remains to be present. The proposed development would cause significant ground disturbance that has potential to damage or destroy any below ground heritage assets that exist.
3. National Planning Policy Framework (NPPF – 4.1) paragraph 200 states that:
"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."
4. The consultation response from Dr Hannah Cutler (Senior Archaeological Advisor for Suffolk County Council) dated 03/04/2024 noted the following in respect of the submitted applications:

"Given the high potential, lack of previous investigation and large size of the proposed development area, I recommend that, in order to establish the full archaeological implications of this area and the suitability of the site for the development, the applicant should be required to provide for an archaeological evaluation of the site prior to the determination of any planning application submitted for this site, to allow for preservation in situ of any sites of national importance that might be defined (and which are still currently unknown)."
5. In the light of this consultation response in line with NPPF paragraphs 200 and 201, Suffolk Coastal Local Plan Policies SCLP12.24 (Land at Humber Doucy Lane) and SCLP11.7 (Archaeology), and Ipswich Local Plan Policy DM14, Reason for Refusal 8 of IP/24/00172/OUTFL and Reason for Refusal 7 of DC/24/0771/OUT state the following:

"... it is considered necessary that a full archaeological evaluation needs to be undertaken given the size of the site and its very high archaeological potential, in order for the results of the evaluation along

with a detailed strategy for further investigation and appropriate mitigation to inform the development to ensure preservation in situ of any previously unknown nationally important heritage assets within the development area ..."

Area of Disagreement

6. SCC, ESC and IBC are of the view that the systematic below ground archaeological investigation should have been part of the original submission due to the high potential for further unidentified archaeological remains as noted in the Statement of Case submitted by Suffolk County Council. The appellant disagrees with this assessment.

Areas of Agreement

7. The application site had never been the subject of systematic below ground archaeological investigation which should have been part of the original submission due to the high potential for further unidentified archaeological remains and resulted in the reasons for refusal. As noted in the Statement of Case submitted by Suffolk County Council, trenched archaeological evaluation was commenced on 30th September 2024 by Oxford Archaeology. SCC go on to state:

"The trenched archaeological evaluation is being used to ground truth the geophysical survey results, sampling geophysical anomalies as well as any blank spaces to assess the significance of archaeological heritage assets ... The results record two main concentrations of archaeology (as suggested by the geophysical survey) and the absence of any funerary material. What blank trenches have been seen and the targeted trenches over the geophysical anomalies shows that in this instance the geophysical survey has largely been accurate in showing the extent of archaeological remains on this site ... Whilst trial trench evaluation is ongoing and unfinished, these areas of strong geophysical responses have now been exposed and have been viewed by Dr Cutler sufficiently enough to update the SCCAS opinion: SCCAS is satisfied that whilst there are archaeological remains that will certainly require targeted mitigation excavations there is nothing of schedulable quality (national significance) and worthy of preservation in situ."

8. SCCAS is satisfied that whilst there are archaeological remains that will certainly require targeted mitigation excavations there is nothing of schedulable quality (national significance) and worthy of preservation in situ. Similarly, a small section of the trial trenched evaluation could not be completed (currently used by Ipswich Rugby Club). As this is not on an area of strong geophysical responses, SCCAS is happy for this to be secured by conditions.
9. Accordingly, SCC recommend that the archaeological investigation has progressed sufficiently so that Reason for Refusal 8/7 on archaeology can be withdrawn.
10. SCC propose the following conditions which, with the changes marked, are agreeable to SCC and the Appellant (but are not agreed by ESC/IBC, who intend to propose changes):

Archaeological Mitigation condition:

No development shall take place within any phase of the development until an implementation of a full programme of archaeological work for that phase has been secured in accordance with a Written Scheme of Investigation which has been submitted and approved by the Local Planning Authority. The Written Scheme of Investigation shall include:

- a. The programme and methodology of site investigation and recording.
- b. The programme for post investigation assessment.
- c. Provision to be made for analysis of the site investigation and recording.
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation.
- e. Provision to be made for archive deposition of the analysis and records of the site investigation.
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Policy DM14 of Ipswich Local Plan, incorporating the Core Strategy and Policies Development Plan Document (DPD) Review, and the Site Allocations and Policies (Incorporating IP-One Area Action Plan (AAP)) DPD Review and Policy SCLP11.7 of Suffolk Coastal Local Plan (2020). and the National Planning Policy Framework (2023).

Post-excavation Reporting, Publication and Archiving condition:

No dwelling hereby approved shall be occupied within any phase of the development until the site investigation and post investigation assessment for that phase of the development has been completed, submitted to, and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under Condition X and the provision made for analysis, publication and dissemination of results and archive deposition.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Policy DM14 of Ipswich Local Plan, incorporating the Core Strategy and Policies Development Plan Document (DPD) Review, and the Site Allocations and Policies (Incorporating IP-One Area Action Plan (AAP)) DPD Review and Policy SCLP11.7 of Suffolk Coastal Local Plan (2020). and the National Planning Policy Framework (2023).

Signatures

ON BEHALF OF SUFFOLK COUNTY COUNCIL

Signed

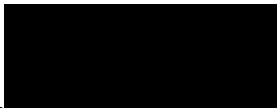


Name Mr Neil McManus BSc (Hons) MRICS - Development Contributions Manager

Dated 09 December 2024

ON BEHALF OF IPSWICH BOROUGH COUNCIL

Signed.....

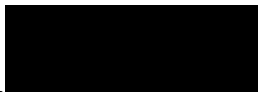


Name..... James Mann

Dated.....13.12.2024

ON BEHALF OF EAST SUFFOLK COUNCIL

Signed.....



Name.....Kathryn Oelman

Dated.....13.12.2024

ON BEHALF OF THE APPELLANTS

Signed



Name Kevin Coleman, agent for the Appeal (Phase 2 Planning)

Dated 09 December 2024