The importance of a robust EIA process and effective community consultation for an archaeologically sensitive site

We have been involved with the EIA and ongoing archaeological advice for a residential development to the north west of Bury St Edmunds, Suffolk. The site was found to have key buried archaeological resources (such as remnants of former settlement), which the ground works of the proposed development would inevitably have an impact on. The planning application (supported by an ES) was submitted in autumn 2014 and the scheme was granted outline planning consent in early 2015. However, a subsequent complaint to the Local Government Ombudsman added further complication to discharging the pre-commencement planning condition for archaeology.

As part of the comprehensive EIA procedure, in line with best practice, as well as undertaking extensive consultation with the Suffolk County Council Archaeology Officer (SCCAO), we commissioned several stages of site-specific archaeological evaluation (aerial photography, geophysical survey and two phases of trial trenching) to better understand the previously unknown and unrecorded archaeological resource across the proposed development area. The reports were technical appendices to the cultural heritage chapter in the submitted ES.

The effects of the proposals were judged to be significant for the EIA, without applying any form of mitigation. However, the predicted effect on archaeology could be wholly mitigated through the full excavation of specific zones of the site, the related schemes of community involvement and dissemination of the results to the local community and subsequently to the wider archaeological community.

It is widely recognized in government guidance and policy that the historic environment provides the basis for a community’s sense of place and connectivity with past communities that shaped the local landscape.

While the very process of excavation can be viewed as destructive, it does yield the most reliable evidence and can lead to an expression of the past for those that live, or are planning to live, close to the site of discovery. It is important for communities to understand the local significance of their historic environment, as it can assist and empower individuals to instigate important social inclusion projects that can aid local economic stability.

Implementation of the agreed scheme of archaeological mitigation commenced on site in March 2016. The excavation strategy, or Written Scheme of Investigation (WSI), produced to satisfy the planning condition imposed by the SCCAO, clearly stated how the site works would be accompanied by at least two public open days and other schemes of dissemination to local schools, parish councils etc.

The importance of extensive community involvement and dissemination of the archaeological findings came sharply into focus for the client and ourselves after specific complaints were made to the Ombudsman by locals in respect to the archeology work undertaken in relation to the proposed development. Whilst by this time the outline planning consent could not be challenged, the complaint raised uncertainty over the validity of the WSI and potentially the archaeological investigations that had been commenced.

Our extensive evaluation process and long-term consultation with the SCCAO (undertaken throughout the EIA period) served us well throughout the following year of accusations, and in early 2016 the Ombudsman rejected all of the allegations questioning our archaeological evaluation of the site and the manner in which the SCCAO had handled the necessary site investigations.
It was concluded that the complainant had failed to acknowledge the transparent nature of our EIA for the development proposals, where the results of all the archaeological surveys were appended to our ES and summarised within our ES cultural heritage chapter.

The complainant then attended the first organised open day event (May 2016) and soon realised the extensive knowledge of the archaeological resource being shared openly and enthusiastically with no hidden agenda or unreasonable timescales jeopardising the archaeological recording.

Since then, separate local events have been organised in collaboration with other local interest groups in order to spread the word on the archaeological findings. The professional and transparent manner by which the archaeological scheme of investigation has been carried out by all parties has fully satisfied this element of the planning conditions.

John Trehy, Associate Director, Terence O’Rourke Ltd, August 2016.