

**To:** Planning Department of Woking Borough Council

**From:** Heritage Conservation Group: Archaeology

**Application Number:** PLAN/2019/1176

**Date Consultation Received:** 11/12/2019



**Address:** Land south of Kingfield Road and East of Westfield Avenue, Westfield Avenue, Westfield, Woking

**Proposal:** Redevelopment of the site following demolition of all existing buildings and structures to provide replacement stadium with ancillary facilities including retail, hospitality and community spaces, independent retail floorspace and medical centre and vehicle parking plus residential accommodation comprising of 1048 dwellings with 5 buildings of varying heights together with landscaping, highway works, vehicle parking, bin storage, cycle storage, plant and other ancillary works.

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### Comments:

Following the submission of my comments dated 17/12/2019, I have now located the submitted Archaeological Assessment (undertaken by MOLA) which is detailed within the EIA Methodology documents (ES vol. 3, App 01, Part 3, (EIA Methodology) – Annex 11). I note that since the earlier submission to support the EIA scoping there have been some minor updates in respect of the proposed construction techniques and areas of impact. Therefore it is somewhat disappointing that this document has not been updated, in line with comments I supplied as part of the EIA scoping exercise, regarding the unacceptability of the recommendations. On review of the changes, I have no change to make to my earlier comments, supplied below for reference:

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The Assessment concluded that no known Heritage Assets are present within the development area, with the exception of some 19<sup>th</sup> and 20<sup>th</sup> century building remnants, and identified a low potential for previously unknown remains dated to the Prehistoric period, due to the location near to the Hoe stream. However the limited potential for archaeological survival was also highlighted given the impact of previous development on the site.

On this basis, some further intrusive archaeological investigation is likely to be required in order to confirm; the archaeological potential, the extent of prior impact and the extent of proposed impact. Whilst I agree with this, the proposed suggestion of a 'Watching Brief' (otherwise known as 'Archaeological Monitoring') to mitigate the destruction of any potential remains is likely to be entirely inappropriate. Carrying out the archaeological work prior to the commencement of construction work is far better suited for a development of this scale - in the event that areas of archaeology are revealed, we would be in a better position to initiate suitable mitigation measures; and if no deposits were revealed, the building work could proceed unimpeded by archaeologists. Due to the large area of the site, I recommend that an archaeological trial trench evaluation/targeted test pitting exercise should be undertaken in the first instance to confirm any areas which are likely to have retained archaeological potential as well as the nature, date, extent and significance of any archaeological Heritage Assets present. This will allow further decisions to be made about what (if any) mitigation measures are necessary.

Given that there is nothing to suggest remains worthy of preservation *in situ* will be present, I do not recommend that the archaeological work needs to be carried out in advance of planning permission (although it is of course better that the work be carried out at the earliest opportunity); but in this

instance would recommend that the work be secured by a condition requiring a scheme of archaeological work once, and if, planning permission is granted. To ensure the required archaeological work is secured satisfactorily, the following condition is appropriate and I would recommend that it be attached to any planning permission that may be granted:

*No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work, to be conducted in accordance with a written scheme of investigation which has been submitted to and approved, in writing, by the Local Planning Authority.*

Please note that these comments are made from the perspective of below ground archaeology. The site is located in the vicinity of a number of listed buildings, which any proposals may impact the setting of. Therefore the relevant Woking Borough Council Conservation Officer should be contacted for comments on the implications of this development.

Alex Egginton, 17/12/2019

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**Signed:** Alex Egginton, Archaeological Officer

**Date:** 28/01/2020

**File Ref:** Con/33/4/29