

# Internal Consultation Response

**To:** Matthew Shepherd, Planning Officer  
**From:** Sarah Orr, Archaeology  
**Extn:** 2805

**Your Ref:** 23/02094/FULMAJ  
**Our Ref:** CWB12177  
**Date:** 07/11/2023

**23/02094/FULMAJ:** Full planning permission for the redevelopment of the Kennet Centre comprising the partial demolition of the existing building on site and the development of new residential dwellings (Use Class C3) and residents ancillary facilities; commercial, business and service floorspace including office (Class E (a, b, c, d, e, f, and g)); access, parking, and cycle parking; landscaping and open space; sustainable energy installations; associated works, and alterations to the retained Vue Cinema and multi storey car park.

## **The Mall, The Kennet Centre, Newbury**

Thank you for your consultation of 25/09/2023 on the above planning application following the refusal of the previous application 21/00379/FULMAJ. This is for a site within the earliest occupied part of the town of Newbury, as well as perhaps holding evidence from 10,000-year-old human activity - though work is needed to establish the potential for surviving deposits under the existing buildings.

An archaeological desk-based assessment (DBA) by Oxford Archaeology was undertaken for this earlier application in December 2021 though not submitted until September 2022, and I commented on this document that month in my response to 21/00379/FULMAJ. Though going some way towards satisfying NPPF Para 194, I was disappointed that the assessment was not as detailed or careful as I would have expected. I listed its shortcomings, so it is surprising that in this amended scheme for the Kennet Centre, no attempt has been made to address any of these matters. The same 2021 document by Oxford Archaeology has been submitted this time, although with an added Lochailort front cover dating it to September 2023.

The criticisms I have will therefore be repeated here: It is not customary to use Heritage Gateway links in a DBA, and we maintain the West Berkshire HER, not the 'Berkshire HER'. The inclusion of an extract from the 1849 enclosure map (Fig 9) doesn't help at all as the study area is blank, whereas (for example) the 1849 Davis map would have added to the map regression. The section on Previous Archaeological Investigations has not emphasised the low percentage of the area of The Mall that was subject to any fieldwork; much of what was able to be undertaken in limited areas was rescue excavation, with only the Wessex Archaeology work in the south-east corner of the Kennet Centre for the Cinema being done to modern standards. This absence of previous work means it is even more important to look for opportunities now to increase our knowledge of Newbury's evolution, and what went before it.

I would have liked more analysis of geo-technical data in terms of palaeo-environmental evidence that might survive – a brief mention is made in the DBA of a demolition desktop appraisal by Robert Bird Group (which I would like to have seen), but not apparently the Soiltechnics preliminary investigation and ground investigation of 2020 which included the possibility that a shallow covering of peat is present in the area. The Oxford Archaeology DBA did not use an image of the Upper Palaeolithic/Mesolithic deposit model of archaeological potential, or other evidence which might help target any future groundworks. A plan of where there might be other archaeological remains adjacent to historic buildings as mentioned in the report para 12.1.2 would also have been helpful. I was also interested in establishing whether any industrial deposits relating to the Eagle Works might be present, so identifying this area against an overlay of the new development would be another advantage. The ironworks did not of course cover the whole area that became the Kennet Mall but only a small percentage of it. Its 20<sup>th</sup> century appearance was also not a multi-storey industrial one like northern mills or factories, but from the evidence of a 1948 oblique aerial photograph, a much more jumbled arrangement of large sheds.

The most serious fault in the Oxford Archaeology DBA is its conclusion that that archaeological deposits and potential in a development as complex as this can be dealt with under a watching brief condition. It is easy to assume that a 1970-80s construction such as the Kennet Centre would have removed all earlier deposits, but evidence from other shopping centres that have been recently redeveloped, such as in Southampton and Oxford, has shown that some significant archaeology can survive. Any opportunity should therefore be taken through initial ground investigations to gain information about the character, nature, extent and significance of the archaeological resource before development starts – this includes palaeoenvironmental deposits, an important resource telling us about the flora and fauna of the area from the end of the Pleistocene and the beginning of the Holocene epoch. At the very least a phased approach to understanding this potential is needed, including field evaluation. Without more information it is simply not possible to affirm as in the Planning Statement para 18.6 that ‘the proposed development will not result in any harm to any potential archaeological remains’.

Though some changes have been made to the redevelopment scheme that slightly reduce the height of Blocks A, B and E, the proposals of 23/02094/FULMAJ would enact major alterations in a highly visible location within Newbury’s Conservation Area and historic core, albeit a location where late 20th century building has been deemed to be less than successful. Should this character-changing alternative be considered acceptable, I would request that the following condition is attached to any approval granted, to ensure that the mistakes of the 1970s are not repeated in terms of heedlessly destroying archaeological evidence of the human story in Newbury:

No development including site clearance shall take place within the application area until a Stage 1 written scheme of investigation (WSI) for a programme of archaeological work has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by Stage 1, then for those parts of the site which have archaeological interest a Stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the WSI no site clearance work or development shall take place other than in accordance with the agreed WSI, which shall include:

A. The Statement of significance and research objectives, the programme and methodology of archaeological site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting archaeological material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the Stage 2 WSI.

Reason: To ensure that any significant archaeological remains that are found are adequately recorded. Such an approach follows the guidance set out in paragraph 205 of the 2021 National Planning Policy Framework and is accordant with the requirements of Policy CS19 of the West Berkshire Local Plan (2006-2026) 2012.

Should this staged approach uncover surviving archaeological features, finds and ecofacts beneath the Kennet Centre Mall, it would certainly be of high public benefit for this evidence to be properly recorded, analysed, archived and interpreted for the residents of Newbury and beyond.

If you would like to discuss this site, further please do not hesitate to contact me.

Sarah Orr

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