

## MATTER 3 – EMPLOYMENT

Issue - Whether the Plan is justified, effective and consistent with national policy and the Local Plan Strategy (LPS) in relation to the supply and distribution of employment land?

### 1 Introduction

1.1 Historic England's Objection to this Site relates to the impact which its development might have upon the archaeology of the area and the way in which this has been addressed within the Plan.

### 2 Archaeology

#### 2.1 Soundness of the Plan in respect of its approach to archaeology

2.1.1 The identification of SD12 for employment development as currently proposed is not sound as its allocation is neither clearly justified within the Plan nor is its allocation consistent with either the Policies in the Adopted Plan Strategy or with national policy guidance.

2.1.2 This site lies within the Vale of Pickering, a low-lying plain between the uplands of the North York Moors and Cleveland Hills, to the north, the Howardian Hills, to the west, and the scarp of the Yorkshire Wolds, to the south. This area exhibits evidence of continuing human habitation and activity from the early prehistoric periods through the Roman period, and up to the present day. This area has been the subject of a comprehensive archaeological research project for over 25 years. Based upon this work, Historic England can say with some confidence not that there is a high probability that these sites will contain archaeological remains, but also that these remains could well be of national importance.

2.1.3 The importance of the archaeology of this area is recognised within the Ryedale Plan Strategy. Policy SP12 states:-

*“Development proposals which would result in substantial harm to or total loss of the significance ... to the archaeological significance of the Vale of*

*Pickering will be resisted unless wholly exceptional circumstances can be demonstrated”.*

- 2.1.4 Paragraph 139 of the NPPF makes it clear that non-designated archaeological remains that are demonstrably of equivalent significance to Scheduled Monuments (such as the ones which could well be present on these sites) should be considered as if they were a designated heritage asset - i.e. that substantial harm or total loss should be wholly exceptional.
- 2.1.5 Paragraph 126 of the NPPF sets out a requirement for Local Plans to conserve heritage assets in a manner appropriate to their significance. When considering the impact of a proposed development upon the significance of a designated heritage asset (or a non-designated archaeological site of equivalence to a Scheduled Monument), Paragraph 132 of the NPPF makes it clear that great weight should be given to the asset’s conservation. The development of these areas could well result in the total loss of, or harm to, elements which contribute to the significance of important archaeological remains.
- Policy SP12 of the Adopted Local Plan Strategy in that it could result in substantial harm or loss to the archaeological significance of a site in the Vale of Pickering
- 2.1.6 At present, not only is there insufficient justification for why the authority is proposing a site in a location which appears to conflict with a Policy in the Adopted Local Plan Strategy but the Development Principles for this Policy does not set out how any archaeology on this site should be addressed as part of the development process. Consequently, Historic England considers that the allocation of this Site for employment development, as proposed in the Submission Local Plan, would be in conflict with the following aspects of the Adopted Local Plan:-
- Policy SP12 in that it could result in substantial harm or loss to the archaeological significance of a number of sites in the Vale of Pickering
- 2.1.7 It would also be contrary to national policy guidance as set out in the NPPF insofar as it would not:-
- Help to deliver a “*positive strategy for the conservation and enjoyment of the historic environment*” as is required by NPPF Paragraph 126.

- Contribute to protecting or enhancing the historic environment. Therefore, it will not deliver sustainable development in terms of the conservation of the historic environment [NPPF Paragraph 7].
- Conserve heritage assets in a manner appropriate to their significance. Therefore it will run contrary to one of the Government’s Core Planning Principles [NPPF Paragraph 17].
- Give great weight to the conservation of the area’s designated heritage assets (or non-designated archaeological site of equivalent significance to a Scheduled Monument) [NPPF, Paragraph 132]
- Provide clear and convincing justification for the harm that it would cause to the historic environment [NPPF, Paragraph 134].

## 2.2 The archaeology of the Vale of Pickering

- 2.2.1 The Vale of Pickering area is an extensive archaeological landscape which stretches along the entire length off the Vale of Pickering across Ryedale and into its neighbouring Planning authority, Scarborough Borough.
- 2.2.2 The Vale of Pickering contains concentrations of some of the most important archaeological landscapes that are known from the British Isles. The site of Star Carr (at the eastern end of the Vale, in Scarborough) represents one of the most important Mesolithic sites in Europe and the continuously-occupied sand and gravel terraces between the chalk Wolds and the former wetlands of the Vale have been subject to decades of English Heritage/Historic England-funded research through the Landscape Research Centre. This area exhibits evidence of continuing human habitation and activity from the early prehistoric periods through the Roman period, and up to the present day. The buried prehistoric landscapes and the unique, continuous “ladder” settlements are an extraordinary survival of human activity on a landscape scale, preserved beneath thick sand-blown deposits across the Vale.
- 2.2.3 Based upon the understanding gained during 25 years of archaeological research and excavation on several sites and across the remainder of the Vale of Pickering, there is a high likely that Site SD12 will contain archaeological remains - potentially of national importance.

2.3 Is this allocation justified?

- 2.3.1 No. Historic England fully accepts that, given the extent of the archaeological landscape within which the District is located, it is almost impossible to identify any sites for development around its Market Towns which are not going to impact upon the archaeological remains of this area. Indeed, it would be virtually impossible for Ryedale to meet its objectively assessed development needs were it to try to do so. Consequently, the Local Plan has little option other than to direct a proportion of the plan's assessed development needs to an area where there is a high likelihood of archaeological remains some of which could well be of national importance. However, the Plan needs to explicitly set this out together with the reasons why it is considered appropriate to allocate sites which will result in the loss of, potentially, national-important archaeology.
- 2.3.2 Given the limitations upon the choice of sites in the District, Historic England has accepted that it is acceptable to allocate land in these areas provided that any development proposals are informed by a robust archaeological assessment which will help further our knowledge and understanding of the Vale of Pickering.
- 2.3.3 Ryedale is not in a unique situation. Neighbouring Scarborough Borough Council, at the eastern end of the Vale of Pickering, faced exactly the same challenges in their Local Plan. Their reasoning and the approach they set out in their Plan was endorsed by their Local Plan Inspector. Given that both Plans are dealing with the same archaeological landscape, it is suggested that the Ryedale Sites Document adopts a similar approach.

2.3.4 **Suggested Change**

**Insert an additional Paragraph in Section 3 (possibly after Paragraph 3.2) which explains why the Local Plan Sites Document has had to identify a site for development which would be likely to result in harm to nationally-important archaeology**

[This could be based upon the approach set out Paragraph 2.32 of the Adopted Scarborough Local Plan]

2.4 Inspector's Question 5.13 (b) – Are the Criteria effective, justified and consistent with national policy?

2.4.1 As has been said, given the severe limitation upon the choice of sites in the Ryedale, Historic England has accepted that it is acceptable to allocate land in these areas provided that any development proposals are informed by a robust archaeological assessment which will help further our knowledge and understanding of the Vale of Pickering. It is essential that the Plan alerts prospective developers of the likelihood that they may encounter important archaeological remains and also which explains how they might need to deal with this archaeological resource. However, this key element is also missing from the Local Plan

2.4.2 Again, Ryedale can learn from the approach taken by their neighbouring authority, one that was endorsed by their Inspector.

2.4.3 **Suggested Change**

(a) For Policies SD12 insert the following additional Development Principle:-

*“Appropriate archaeological evaluation and mitigation as detailed in Appendix A”*

(b) Insert an Appendix at the end of the Plan which sets out additional information and advice about how the archaeology on Site SD12 would need to be addressed. The suggested wording is set out in Historic England's representations to the submitted Plan.