



MK 2.2

Town and Country planning Act 1990

S78 Appeal against the Refusal of Planning Permission

Summary Proof: Historic Environment (Archaeology)

Witness: Nicholas Crank BSc MCIfA

Reference:

PINS APP/Y0435/W/20/ 3251121

LPA 19/01818/OUT

Appellant: Appeal by HB (South Caldecotte) Limited

Site: South Caldecotte, Bow Brickhill

Date: 5th August 2020

Summary

My name is Nicholas Crank. I am employed by Milton Keynes Council (“MKC”) as Senior Archaeological Officer in the Conservation & Archaeology Team and I am MKC’s witness on archaeological matters in this appeal.

My evidence considers:

- The archaeological background to the Site¹ (section 4), and specifically the relationship of the archaeology in Area 2 to the nearby Scheduled Monument of the Roman Town of Magiovinium and Roman Fort (National Heritage List no. 1006943) highlighting how the archaeology in area 2 should be regarded as a significant and distinctive integral component of the Magiovinium settlement;
- (section 5) the significance of archaeology in Area 2, challenging the assessment put forward by the Appellant and demonstrating how it underestimates the significance and consequently acts to reduce the level of heritage harm. This section includes a summary (5.6.5, page 18) of why these heritage assets are in my view of high regional significance;
- how methodological inconsistencies with the Environmental Statement act to artificially reduce the level of heritage harm (section 6);
- (section 7) how the Appellant does not properly consider alternatives that would avoid or reduce the level of heritage harm and the Proposal is therefore not compliant with good practice or Plan:MK (C.D. E.1) policy HE1 (F) which requires that the assessment of the benefits of the Proposal should only be made once ‘all feasible solutions to avoid and mitigate that harm have been fully implemented’ and Site-specific policy SD14 (9) of Plan:MK (C.D. E.1) which requires significant archaeological constraints to inform the layout of the development.;
- and finally (section 8), I summarise why taking into account the above evidence, the Proposal (footnote 1, below) is not compliant with the conservation objectives of the NPPF and NPPF policy 197 in particular, and also does not comply with the development plan policies set out in Plan:MK (C.D. E.1) HE1 (F), SD1 (A19) and SD14

¹ This Inquiry is into the refusal of a planning application (planning reference 19/01818/OUT) (“the Proposal”) for land at South Caldecotte in Milton Keynes (“the Site”). The Proposal is for outline planning permission with all matters reserved except access.

(C9) and I therefore consider that the Proposal is unacceptable when viewed from the perspective of its impact on the historic environment.

This summary and my main proof of evidence (CD MK2.1) should be read in conjunction with that of Senior Planning Officer Mr David Buckley of MKC (CD MK5.1 & MK5.2), who examines the range of planning benefits and dis-benefits of the Proposal and undertakes MKC's planning balance in relation to these.