

CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL  
APPLICATION BY CEG LAND PROMOTIONS LTD  
(PINS REF: APP/W4705/V/18/3208020)  
CALLED IN FOR DETERMINATION BY THE SECRETARY OF STATE

**The Roman Marching Camp at Burley-in-Wharfedale**

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**A Introduction to the Roman Camp**

Despite what is stated in the planning application, this Roman Camp was not “recently found.” The developer found this fort before the planning inspector’s hearings. The appellant did not include any reference to the Roman Camp to the Planning Inspector or the Council at the Core Strategy hearings.

The notice of the Roman Camp was received by Bradford Planning on 1st December 2017. Case ref: 16/07870/MAO, original filename: *HERITAGE DESIGN BRIEF ROMAN TEMPORARY CAMP - 5017376.tif*.

The presence of this Roman Camp changes what should be allowed to happen on this site.

The correct legislation which applies here is the Ancient Monuments Act, which will either “Schedule” the ruins or will specify numerous safeguards. However, Bradford’s planning officers only quote normal planning law, which is far less onerous than the Ancient Monuments Act.

The report provided by NAA describes the site as **“considered to be of demonstrable equivalence to a scheduled monument....and is considered to be of High importance value.”** Indeed as the site is unique in this area the report further describes it as an **“important and exciting discovery, particularly at regional and local level”**, its location in the hinterland of the Roman Fort at Ilkley and its likely relationship to this important site increases its significance and interest (NAA, 2016).

**Appendix 1** Extract from the original planning application: *16/07870/MAO* document *CHAPTER K - HERITAGE ABOVE BELOW GROUND -4653334.pdf*, page 39 point K4.90 and also *APP K2 TT-EVAL REPORT-4653510.pdf*

**A1 The appellants view of the Roman Camp.**

**Appendix 2** This is also detailed in the appellants statement of case, in which NLP state on page 10, section 4.12, part 5: Case ref: *APP/W4705/V/18/3208020* document name: *APPELLANTS STATEMENT OF CASE-5260583.pdf*

*“The remains of a temporary Roman camp, which is deemed to be of national significance, lies beneath the site. It is not, however, visible and until now has been undiscovered and therefore the existing public benefit derived from the heritage asset is currently nil. The proposals, formulated in consultation with Historic England, will unveil this and make it a central place-making feature within the development and as a wider educational resource for both the proposed school and the wider community. Such an approach to this previously undiscovered heritage asset of national significance will therefore deliver considerable public and heritage benefits and can only be achieved as a result of the wider development of the site.”*

## **B Roman Camp surveys.**

Archaeological surveys (magnetometer, geophysics and LiDar) carried out at the request of the developer revealed the existence of several features within the development site which were thought to be archaeological in origin. The surveys were carried out by NAA (Northern Archaeological Associates).

### **B1 Report findings and discussion.**

The main feature is the playing card shaped ditch enclosure described in the archaeological report as a Roman marching camp (Fig.1).

**Figure 1 Location of Roman Marching camp within proposed development boundary.**





**C1 Risk.**

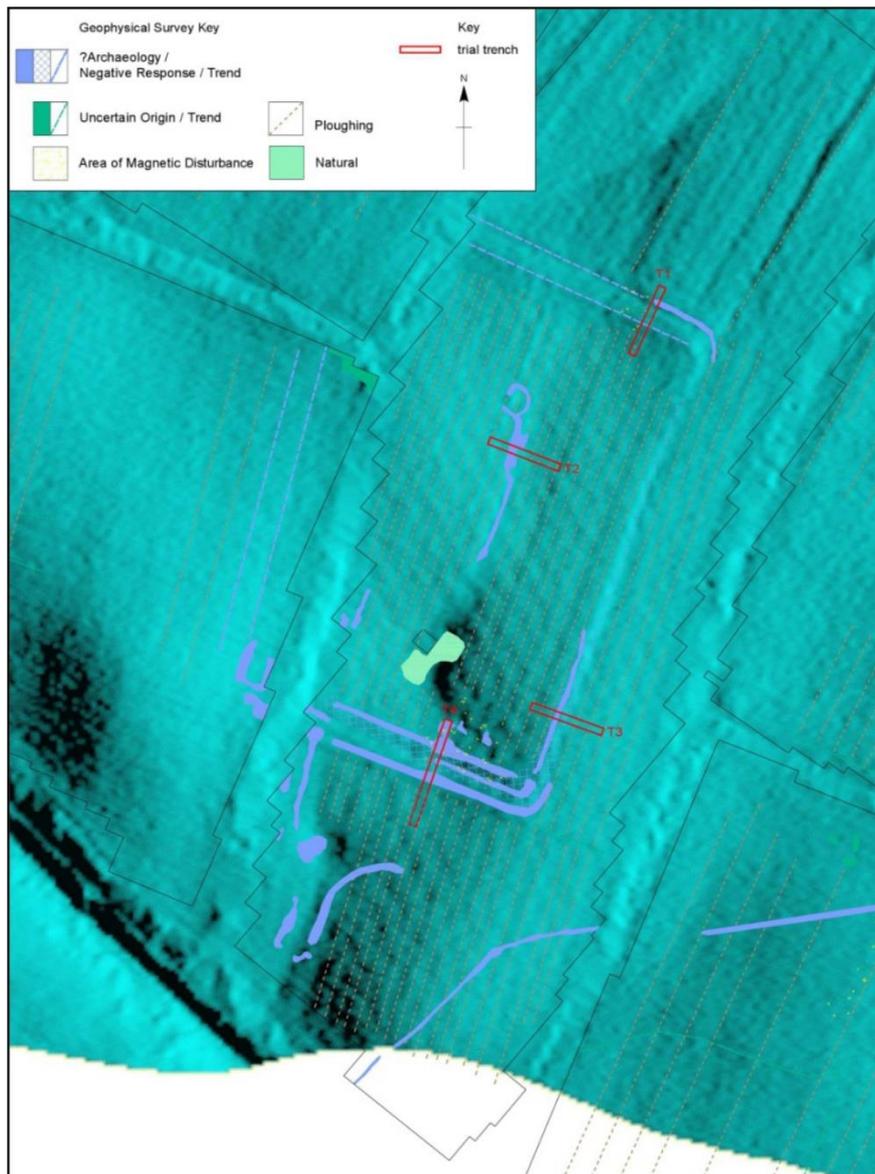
The site therefore is of ***national importance*** in the understanding of the Roman occupation and military strategy. The monument lies within the Southern part of field 5 within the area scheduled for residential development. Indeed, the initial plans show the site of the camp coincident with that of the proposed school, further excavation would therefore be at Bradford council's risk with a cost born by the tax payer not the appellant.

**D What should happen next?**

What should now happen here is very simple and it is spelt out by law and as noted in Historic England's correspondence of December 21<sup>st</sup>, 2017. ***"It is essential that a robust mechanism to deliver the heritage significance of the camp, its management and the wider public benefits proposed is secured as part of the consent as required by the NPPF."***

**Appendix 3** Extract from the original planning application: 16/07870/MAO document 16\_07870\_MAO-. HISTORIC ENGLAND-5034083-1.pdf, foot of page 1.

That is, there should be a full archaeological dig to determine the extent and significance of the Roman Camp. There are features on the LiDar image that have not been surveyed at all, most notably on the southern edge. (See below)



Appendix 1 - CHAPTER\_K\_-\_HERITAGE\_ABOVE\_\_\_BELOW\_GROUND\_-4653334.pdf, page 40

The BDCC planning officers have received a very clear recommendation from their statutory consultee English Heritage (as noted above) not to determine this application until after many safeguards are put in place. Unsurprisingly, English Heritage has recommended a full programme of archaeological excavations be completed and properly assessed before the planning application is determined (approved or not approved) by the planning authority. Their recommendations are normally followed under such circumstances.

BDCC officer's comments about English Heritage and the Roman Camp contained in their officers' report simply "recommending approval." This is contradictory to the advice they had received from English Heritage.

The site will be totally removed as a result of excavation during construction (NAA, 2016). The impacts of construction will be major and the significance substantially adverse (NAA, 2016). The

developer states that site will become an integral part of the completed project however by this point all of the archaeology will be removed, the camp cannot be preserved by building a few houses with red tiles roofs to represent "Roman Britain" this is inappropriate as the site is military in function, there would have been a wooden palisade and ditch. This lack of understanding by the developer does not inspire confidence in their ability to "ensure the Roman camp is managed and maintained as a tangible recreational and educational resource for the community". The planning documents state that "the strategy which has been adopted will have a substantial beneficial impact on the Roman camp" we would question how total removal and covering with a housing development (associated sewerage pipes, services etc.) can be beneficial to fragile, insufficiently documented archaeology, this lack of understanding underpins the entire development plan and is at best naïve at worst heartless.

### **E Other areas of interest**

The geophysical survey of the site also yielded other archaeological remains which have not been fully investigated. Most notably a well-defined ditch like response in Area 14 which extends into area 5. This ditch like feature has a distinct linear shape with a defined corner. This was not investigated, this could be another enclosure, there may be an all-important signal station and it could contain evidence for usage and environmental evidence in the form of rubbish pits containing food waste and preserved seeds which would allow an environmental reconstruction of the site during Roman occupation. The presence of these other features suggests that the developers cannot "predict the likelihood that currently unidentified heritage assets...will be discovered in the future" NPPF Section 16. The excavation of these other features may significantly delay the start of construction and therefore the delivery of the scheme as a whole.

The rest of the site could also provide the vital dating evidence which is at present missing; did the camp pre-date the Fort at Ilkley? Was it part of Cerealis's campaign to subdue the Brigantes Tribe the last great battles in the subjugation of the North? If this site is destroyed we can never answer these questions, more of our heritage will be lost forever, future generations will not be able to use this as an educational resource it will be removed and dumped and then covered in hardcore.

### **F Conclusion**

This proposed development cannot meet the NPPF policy tests in terms of green belt impact. Having regard to the advice at paragraph 144 of the Framework, in addition to green belt harm, substantial weight must be given to any other harm resulting from a proposal.

The impact of the development in archaeological terms does, based on my statement, constitute significant harm. There are also other archaeological features which have not been excavated and whose significance cannot be underestimated, the appellants are unaware of the nature of these features and therefore cannot predict their significance. The archaeological investigation is incomplete.

The development should therefore not be approved.

**Appendix**

Number	Document	Supplied
1	CHAPTER_K_-_HERITAGE_ABOVE___BELOW_GROUND_-4653334.pdf APP_K2_TT-EVAL_REPORT-4653510.pdf	Planning application 16/07870/MAO, on record, Extracts
2	APPELLANTS_STATEMENT_OF_CASE-5260583.pdf	Call in document in APP/W4705/V/18/3208020 Extracts
3	16_07870_MAO-._HISTORIC_ENGLAND-5034083-1.pdf	Planning application 16/07870/MAO, on record, Extracts
4	CHAPTER_K_-_HERITAGE_ABOVE___BELOW_GROUND_-4653334.pdf	