

Heritage Team Response

Date – 18/10/2023

APP/23/00488

Site

The application site is located on the land north of Portsdown Hill land east of College Road and south of South Downs and Havant College.

The site includes a Scheduled Monument – a Roman site SW of Littlepark Wood (NHLE: 1001859). There are a further 2no. Scheduled Monuments outside of the site - Bevis's grave long barrow and early medieval cemetery site (NHLE: 1012831) and Fort Purbrook, including covered way to the east (NHLE: 1001842 - also Grade II* listed). Also to the south of the site is a Grade II listed building - Tower House (NHLE: 1303449 - Grade II) and the site of Farlington Redoubt (HER: 238457), which is a non-designated heritage asset.

Proposal

Application for mixed use, residential development comprising 628 dwellings, community centre, allotments, public open space including play areas, new junction to College Road, related internal access road, footways and cycleways, pumping station and drainage basins.

Policy Considerations

Given the designated heritage assets either within or in close proximity to the application site, the following legislation is relevant.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires planning authorities, when considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

The Scheduled Monuments are protected under the 1979 Ancient Monuments and Archaeological Areas Act on account of their national importance and archaeological, architectural, historical and traditional interest.

The DCMS document Scheduled Monuments and nationally important but non-scheduled monuments (October 2013) sets out Government policy on the identification, protection, conservation and investigation of nationally important sites and buildings for the benefit of current and future generations. It notes that in addition to their intrinsic value, scheduled monuments can contribute to our perceptions of cultural identity and provide unique opportunities for research, education, leisure and tourism, delivering social benefits and contributing to economic growth.

The recently published Good Practice Advice Notes 1, 2, 3 from Historic England, supersede the PPS 5 Practice Guide which has now been withdrawn by Government. The Historic Environment Good Practice Advice (GPA) in Planning Note 2, states at paragraph 4: The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest and provides at paragraphs 8, 9 and 10 that in order for the Local Planning Authority to make decisions in line with legal requirements, the objectives of the development plan; and, the policy requirements of the NPPF, great importance is placed on understanding the nature, extent and level of the significance of the heritage asset.

Of particular relevance for this application, is GPA 3 – The Setting of Heritage Assets. It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of heritage assets. The guidance has been written for local planning authorities and those proposing change to heritage assets. This guidance note also advises that setting is not a heritage asset or a designation in itself, but its importance lies in what it contributes to the significance of the heritage asset.

The National Planning Policy Framework (NPPF September 2023) sets out the policies that the Council must take into account when determining planning applications. The NPPF sets out, in Section 16, the Conserving and Enhancing of the Historic Environment. The following paragraphs are of particular relevance:

189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

196. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

197. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

200. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- (a) the nature of the heritage asset prevents all reasonable uses of the site; and
- (b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- (c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- (d) the harm or loss is outweighed by the benefit of bringing the site back into use.

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

With regards to local planning policy, Policy CS11 (4) of the Havant Borough Core Strategy 2011 states that planning permission will be granted for development that:

‘Protects and where appropriate enhances the borough’s statutory and non-statutory heritage designations by appropriately managing development in or adjacent to conservation areas, listed buildings, scheduled ancient monuments, historic parks and gardens, archaeological sites, buildings of local historic or architectural interest’.

Policy CP16 (1a) of the Core Strategy states ‘Planning permission will be granted for development that is designed to a high standard, which helps to create places where people want to live, work and relax. All development should demonstrate that its design: ‘Identifies and responds positively to existing features of natural, historic or local character within or close to the proposed development site’.

Policy DM20 of the Allocations Plan 2014 states that development proposals must conserve and enhance the historic assets of Havant’.

Assessment

This is the second, major planning application for the site. The first (APP/19/01101) is a hybrid application for a total of 780 dwellings. The second application is for 628 dwellings with a revised layout to that proposed in APP/19/01101.

From a heritage perspective, concerns were raised with the previous application in that the level of potential harm to the heritage assets and their settings, had not been fully assessed in the application or informed the proposed layout. Aside to this, in their discussions with the Council regarding the site as a local plan allocation, Historic England (HE) requested that a bespoke settings study is carried out to establish the significance of the settings of the designated heritage assets so that this can assist with future master planning on the site. This study was commissioned by the LPA, in consultation with HE. The final document was provided to the application prior to the submission of this application. This study advised the following recommendations:

- *Inclusion of a generous, open corridor southwards to be retained, both visually and in terms of a rural landscape character. This will help maintain the integrity of the historic views southwards from the villa plateau, which have been appreciable for millennia for both defensive purposes and aesthetic enjoyment.*
- *Position all new built massing on Site 1 to the south of the Roman road and at a suitable distance down the incline so that the outlook from the highest level (i.e. villa plateau) has clear sight over the roofline of the new development.*
- *Maintain or increase vegetation screening between the site and the listed buildings to the south and south-west.*
- *The sense of openness within the wider setting of Fort Purbrook should be maintained, potentially by means of reduced development density in the south-west corner of the site.*
- *Retain the planted boundary around Site 2 so that any development here continues to be screened from the open landscape which makes an important contribution to the setting of the Roman villa and road. The massing of any new built development will also need to take into consideration the potential to impact the setting of the Roman villa and road as a result of its visibility and effect on the landscape character*

It also advised the following in terms of future application requirements:

- *Proposed site sections to demonstrate the impact of new built massing on the quality of the views, especially from the north end of the site •*
- *Accurate visual representations/verified views , particularly from key vantage points such as the northernmost plateau •*
- *Landscape and visual impact assessment*
- *The results of non-invasive geophysical survey*
- *Archaeological desk-based assessment*
- *A proposed Written Scheme of Investigation (WSI)*
- *Statement of heritage significance*

The application as submitted does include a Heritage Impact Assessment (HIA) by MOLA South. However, disappointingly this does not make reference to the Settings Study commissioned by the LPA.

Nonetheless, the proposed layout has included a north to south axis road, off set to the west from the centre point of the roman villa site, so that it is broadly in line with the Bevis, Long Barrow Grave. However, there is no information to demonstrate how this will work post development in terms of

where the barrow can be glimpsed from the Roman Villa plateau. It is unclear therefore whether this corridor is in the correct position or wide enough to allow the inter-visibility.

The SuDs have been located to the south of the site to increase the open space to the north of the Long Barrow. The built development has been positioned to the south of the Roman Villa site however, it is unclear in the submission, whether there would be a clear sight over the roofline of the new development. A detailed landscaping scheme has been submitted which also shows a tree lined corridor and cycle path to the south of the villa site. However, this is not straight and therefore does not clearly define the historic route.

It is the view of the LPA that as submitted, the proposal would result in harm to the significance to the Roman Villa due to the impact on its setting through the erosion of the landscape with the introduction of urban development. However, as highlighted by Historic England in their response dated 21/8/23, this level of harm cannot be fully assessed until further information / amendments are submitted as set out on Page 9 of their response.

Once this information has been submitted and assessed, further assessment will be made on the layout of the proposal and more detailed design information such as housing types, materials etc.

Conclusion – HOLDING OBJECTION subject to the submission of information as set out in the response from HE on 21/8/23