

Heritage Response

Land East of College Road, Campdown, Purbook.

Application – APP/19/01101

Proposal –

Hybrid planning application comprising; full planning application for the erection of 130 dwellings with the creation of new access onto College Road, landscape, drainage, car parking and associated works; and outline planning application for up to 650 dwellings, community and nursery facility (use class D1 and D2), retail unit (use class A1), public open space, landscaping, diversion of public right of way and associated works and infrastructure.

The 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. It is an allocated housing site in the draft Local Plan 2036.

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

The application submitted is that of a Hybrid. The full planning application relates to the first phase of development. The second, third and fourth phases relate to the outline section of the planning application. The full section proposes 130 dwellings with a new access from College Road. The outline part relates to the construction of 650 dwellings and associated public space, landscaping, diversion of a public right of way.

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 2019) 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:

Para 189 advises that in determining planning applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including the contribution made by their setting.

It advises that in Para 192 that 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 economic vitality; and
- c) The desirability of new development making a positive contribution to local character and distinctiveness.

Para 194 states that any harm to the significance of a designated heritage asset requires clear and convincing justification. It should also pass certain tests depending on the magnitude of harm caused.

Para 196 states that where a development proposal will lead to less than substantial harm, this harm should be weighed up against the public benefits delivered by the proposals.

With regards to local policy the following policies are relevant:

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

In their consultation response dated 22 January 2020, Historic England (HE) have fully assessed the proposal against the relevant planning legislation and national planning policy, with regards to the potential impact on the significance of the heritage assets (which are also outlined in full).

With regards to Phase 1 (the full planning application), the HE response surmises that:

- The chief impact relates to the setting of Fort Purbrook and the undesignated Farlington redoubt.
- The overgrown nature is temporary and there does not lessen its significance.
- The SM is on the Heritage at Risk register
- Overall, there would be slight harm caused from Phase 1 from the encroachment into the field of fire of the SM, which forms part of its setting.
- However, the location of Phase 1 would preserve the visual relationship between the Roman Villa and Road and the nearby Medieval burial site.

With regards to Phase 2 (the outline planning application), the HE response surmises that:

- Layout encloses the Roman Villa on three sides
- Rural setting and outlook would be completely compromised by properties and infrastructure
- The development would sever the association between the heritage assets.
- Phases 2, 3 and 4 in their current form would cause harm to the significance of the roman SM and the medieval burial site SM.
- The impact to Fort Purbrook would be slight.
- Harm to the heritage assets has not been sufficiently justified, nor has sufficient consideration been given to avoid, minimise or offset harm caused.
- The development would result in an erosion of the landscape setting of the Roman Villa which is manifest in limited views that will resultant in and out of the monument to the south.
- The development reduces the ability to understand the landscape setting to the villa and its relationship to earlier and later historic features.
- The proposed layout does not respond to the heritage assets
- Further work can be done to offset this harm.

- With regard to the outline application ('Phases 2, 3 & 4), the current design causes demonstrable harm to the Roman villa and road site in particular (and to Bevis's Grave and Fort Purbrook to a lesser extent) and cannot be supported in their present form.

From the perspective of the local authority heritage officer, the response from and position of HE is generally agreed with. However, it unclear what HE thinks the level of harm is with regards to the Roman Villa i.e. substantial harm or less than substantial harm. I would recommend that the case officer confirms this position with HE.

Nonetheless, the applicants now have the opportunity to address the concerns raised by HE and I would also request to be reconsulted on any further information which is submitted.

Conclusion – holding objection as per HE response dated 22/1/20

Rachael McMurray

Senior Conservation Officer

19/4/20