



Historic England

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Direct Dial: 020 7973 3739

Our ref: P01138790

22 January 2020

Dear Mrs Haywood

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND EAST OF, COLLEGE ROAD, CAMPDOWN, PURBROOK, WATERLOOVILLE
Application No. APP/19/01101**

Thank you for your letter of 6 December 2019 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Significance of the Heritage Assets

The development is located immediately adjacent and/or close to three Scheduled Monuments: a Roman site SW of Littlepark Wood (NHLE: 1001859), 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). Tower House (NHLE: 1303449 - Grade II) and the site of Farlington Redoubt (HER: 238457 - a non-designated heritage asset) are also sited nearby, but will not be considered in their own right as part of this consultation response.

Roman villa and section of Roman road south-west of Littlepark Wood (1001859)

Romano-British villas were extensive rural estates at the focus of which were groups of domestic, agricultural and occasionally industrial buildings. The term 'villa' is now commonly used to describe either the estate or the buildings themselves. The buildings usually include a well-appointed dwelling house and many had integral or separate suites of heated baths. The house was usually accompanied by a range of buildings providing accommodation for farm labourers, workshops and storage for agricultural produce. They were arranged around or alongside a courtyard and were surrounded by a complex of paddocks, pens, yards and features such as vegetable



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plots, granaries, threshing floors, wells and hearths, all approached by tracks leading from the surrounding fields. Villa buildings were constructed throughout the period of Roman occupation, from the 1st to the 4th centuries AD, and provide a valuable index of the rate, extent and degree to which native British society became Romanised, as well as indicating the sources of inspiration behind changes of taste and custom. In addition, they serve to illustrate the agrarian and economic history of the Roman province, allowing comparisons over wide areas both within and beyond Britain. The plan of the villa compound south-west of Littlepark Wood is largely derived from the geophysical survey and supporting evidence from the 2018 archaeological evaluation, with only one of the buildings having been subject of an antiquarian excavation in 1926. From these it is possible to discern that the complex comprises at least six or possibly seven masonry structures that represent the main villa building and ancillary structures, workshops, barns and possibly even a bath house or shrine. The 2018 work confirmed multiple phases of activity, ranging from the 2nd to the 3rd century AD. The volume of mosaic tesserae, floor tiles and imbrex roof tiles suggest substantial and wealthy structures were present within the complex, with some indication for the presence of a bath house. A trackway runs south from the heart of the complex towards the former Roman road. Archaeological investigations have revealed the presence of a masonry structure where the track way meets the road, which may represent a formal entrance with gate house or simply a walled entrance.

Roman roads were engineered routes designed to be used by wheeled vehicles and to facilitate rapid communication across the empire using messengers on horseback. The earliest roads were built by the army as part of the campaign of conquest between 43 and 81 AD, but the construction of later roads was mainly prompted by civil administration. Most (but not all) were formed from a raised earthen embankment known as an agger formed from material derived from flanking drainage ditches. The agger was subsequently metalled. Roman roads frequently became the focus of settlement, industry and burials. The road, which traverses the site in a north-west to south-east alignment, lies about 100m to the south of the main part of the villa compound and forms part of the Chichester (Noviomagus) to Bitterne (Clausentum) road, listed as Route 421 in Margary. It has been suggested that this was one of the points of high ground from which the Roman surveyors laid out the road on its route from Havant to Wickham. The road survives to varying degrees along its length comprising various combinations of a metalled surface with road side ditches close to the entrance to the villa complex, the metalled surface with an absence of ditches to the east and to the west only the ditches appear to remain. The road also survives partially above ground in the form of light earthworks to the western edge of the site.

Villas were often effectively working country estates, usually set within an agricultural landscape which formed the economy of the villa, and over which the villa estate had control. Associated landscape details such as roads and field systems are therefore an important part of the significance of villa sites, in that they help form an understanding of the function and layout of these estates, and this is certainly the case for



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Campdown. The Noviomagus to Bitterne road would have been constructed prior to the development of the villa complex and would have been an important element in siting the original estate in the 2nd Century.

Bevis's Grave long barrow and early medieval cemetery, 100m west of Belmont Castle (1012831)

Long barrows were constructed as earthen or drystone mounds with flanking ditches and acted as funerary monuments during the Early and Middle Neolithic periods (3400-2400 BC). They represent the burial places of Britain's early farming communities and, as such, are amongst the oldest field monuments surviving visibly in the present landscape. Certain sites provide evidence for several phases of funerary monument preceding the barrow and, consequently, it is probable that long barrows acted as important ritual sites for local communities over a considerable period of time and almost certainly influenced the siting of the early medieval burials that have been identified close to the earthwork. Ditches, from which mound material was quarried, flank the mound to the north and south. At the west end of the ditch two Saxon burials were recovered while at the east end some eighty Christian graves dating to the 8th and 9th centuries AD were found.

In this respect the wider open space surrounding this monument is a very important part of its significance. The prominence of burials on higher ground, views to and from the site, and special ritual significance of the landscape, are all factors that make up their setting, and help form an understanding of why the barrow and later burials were positioned on Portsdown.

Fort Purbrook, including covered-way to east (1001842)

Fort Purbrook is one of a group of forts built in the 1860s, known as the Portsdown Forts, whose purpose was to protect Portsmouth Harbour from a landward attack from the north. The Portsdown Forts were constructed specifically to fortify this strategic ridge such that it could not be occupied by an invading French force and used a base from which to bombard the harbour. Fort Purbrook was the furthest east of the group and its eastern flank was further strengthened by the construction of two Redoubts; Farlington Redoubt, to its east side and connected by a covered way (included in the scheduling), and Crookhorn Redoubt, whose exact location is not known. The fort is a very well-preserved example of a mid-19th century fortification, providing understanding of mid-19th century military technologies, strategies of national defence, construction techniques, military accommodation and weapons technology amongst other things.

The open space around the Fort is an important aspect of its historic design and operation, as the field of fire. Whilst the extended areas of fire around the Fort have been subject to modern development, the mid and close range areas currently survive





as open spaces, partly under use of the golf course, and some as grazing or integral parts of the main Purbrook site, and it is possible therefore to still understand and interpret the functionality of the Fort.

Impact of the Proposals

As this advice letter is in response to a hybrid application it will consider the impact of each element separately.

Full planning application for erection of 130 dwellings with the creation of new access onto College Road, landscape, drainage, car parking and associated works

This element, which forms 'Phase 1' of the proposed overall development of the site, is located south-west of the South Downs College, straddling College Road which lies to the west. The development will involve landscaping of existing land, the construction of buildings, roads, pavements and other hard standing, new plantings and boundary treatments along with the installation of new utilities to serve the new dwellings. The proposed buildings comprise chiefly of two-storey residential properties.

The chief impact, in respect of the designated heritage assets highlighted above, will concern the setting of Fort Purbrook. As previously stated, the field of fire of the fort (and the associated undesignated redoubt) form a specific part of their significance, revealing and enhancing understanding regarding its function the purpose of its siting. Although the Heritage Statement and Chapter 7 of the Environmental Statement provided with the application note the overgrown nature of the scheduled monument, this in itself does not justify incurment into the setting of the monument as its overgrown nature is a temporary matter and one which, in part resultant from it being included on the Heritage at Risk register, we are eager to explore options for addressing. As a consequence its location within the field of fire it is felt that the development will cause some harm to the significance of Fort Purbrook through incursion into its setting/field of fire, but given the distance and taking into account the presence of existing development in the area, that this harm will be slight.

With regard to the Roman villa and road, and the prehistoric and early medieval burial site, these monuments presently existing within a rolling, rural landscape similar to that which would have existed at the time of their construction. The location of 'Phase 1' of the proposed development would encroach on this landscape but, due to its location would preserve the visual relationship between these multi-phase features and the outlook of the villa estate and its position in relation to the Chichester to Bitterne road. Taking these factors into account we feel that although the significance of these monuments will be harmed by encroachment into their setting, this harm is also slight.

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,



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diversion of public right of way and associated works and infrastructure.

The second element of the application, for outline planning of an additional 650 dwellings, will comprise the construction of additional residential units and associated landscaping, hard standing, planting, boundary treatments, utility provision, open space and a community nursery facility and retail unit. It will comprise 'Phases 2, 3 and 4' of the overall development, located to the east of the South Downs College and south and west of Scratchface Lane.

The layout of the proposed development encloses the scheduled Roman villa and road site on three sides extending south into the valley. The rural setting and outlook of the villa estate will be completely compromised by the siting of residential properties and associated infrastructure, disassociating it from the surrounding topography and its geographical context. It will also sever its association with other features within the historic environment, namely the scheduled Neolithic long barrow and subsequent early medieval cemetery. Perception of the continuation of human occupation and activity which pervades the prehistoric, Roman and medieval (and post-medieval) periods within this specific locality will be lost through the imposition of modern development through its centre. In addition, the proposed street form will also see the alignment of the Chichester to Bitterne eradicated. The combination of these factors clearly demonstrate that 'Phases 2, 3 and 4' of the development, in its current form, will cause harm to the significance of the two above mentioned scheduled monuments (in particular the Roman site) as a consequence of the serious impact it will have on their setting.

With regard to Fort Purbrook, the continuation of the development into the field of fire will further impact the setting of the monument. However, given the proximity and topographical considerations, we maintain our view that the harm that will be caused to the significance to the fort will be slight.

Policy Considerations

The Roman villa and associated road, Bevis's Grave and Fort Purbrook are protected as a Scheduled Monuments 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.



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One of the principal objectives of the National Planning Policy Framework (NPPF) is the conservation of historic environment (paragraph 20). In particular;

- Paragraph 184 of the NPPF notes that heritage 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.
- Paragraph 190 notes that the local planning authority 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.
- Paragraph 192 describes that in determining applications, local authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, the positive contribution their conservation can make to sustainable communities, and the desirability of new development making a positive contribution to local character and distinctiveness.
- Paragraph 193 is clear that 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; noting that a scheduled monument is one of the highest level of designation). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
- Paragraph 194 requires that 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.

Historic England's Position

Historic England has provided advice previously in respect of this site, commenting on proposals for site allocation for a pre-submission consultation regarding the local plan. We have also provided pre-application advice relating to the scheduled Roman villa. Following geophysical and archaeological investigations the site of the Roman villa was reassessed by our Listing Team and subsequently the protected area was enlarged. Following this the applicant has not engaged in any further pre-application advice with us, despite our encouragement for them to do so. In all our previous



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responses we have made clear the potential impact that would be caused to the setting of three nationally important scheduled monuments and the subsequent negative and harmful effect this would have on their significance. In line with paragraph 194 of the NPPF, any harm to nationally important heritage assets would need to be justified.

As set out in paragraph 2 of the NPPF, planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. Paragraph 48 of the NPPF states that weight may be given to relevant policies in emerging local plans, according to the stage of preparation of the plan, the extent to which there are unresolved objections to relevant policies and the degree of consistency between emerging policies and the Framework. The application site in question is not allocated for development in an adopted local plan. It has been proposed as a development site in the emerging local plan (policy H40), but this plan has not yet been submitted for examination. Issues were raised by both Historic England and Natural England at the pre-submission stage of the local plan, in relation to this site. The degree of consistency there is between the site allocation and the Framework would be tested through the local plan examination, which has yet to take place. Given that the local plan has not yet been submitted, there are unresolved issues in relation to the proposed site allocation and that the consistency of the allocation with the policies of the Framework has yet to be tested, we consider the weight that can be attributed to the proposed allocation is *limited*.

With specific regard to the hybrid planning application that has been submitted, we do not feel that the harm that will be caused to the significance to nationally important, designated heritage assets has been justified, nor has sufficient consideration been given to avoid, minimise or offset the harm caused in line with paragraph 190 of the NPPF. This is particularly pertinent to the outline application. The harm that is caused to the significance by the erosion of the landscape setting of the Roman villa (and other monuments) is particularly manifest in the limited views that will be resultant in and out of the monument to the south. This reduces the ability to understand the landscape setting of the villa and its relationship local topographical and geographical features (such as the Solent) and earlier and later historic features (specifically Bevis's Grave long barrow and medieval cemetery). It also diminishes our cognisance of the ritual landscape within which the Neolithic long barrow was set. Furthermore the proposed layout does not respond in any way to the heritage assets, other than to fully envelope the villa site. Little thought appears to have been given to demonstrate how the proposals to sustain or enhance the significance of the monuments (NPPF, paragraph 192), nor have measures been made to ensure the new development makes a positive contribution to the character of the historic landscape within which they sit through its design. Specifically we would not expect to see the housing development fully enclose the Roman villa and road monument and views from the villa site towards the Bevis's Grave monument should also be preserved. This could be accomplished through a more considered approach to spatial configuration of the



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dwelling and the roads within the development around and to the south of the Roman site in particular.

We would note that the Heritage Statement provided with the application, although dated October 2019, contains out of date information in relation to the Roman villa (excluding the results of the archaeological evaluation and the scheduling revision) and references to the design of the development which are inconsistent with the details provided in the planning application. We also question the categories of significance employed in the Heritage Statement and Environment Statement, as derived from the Design Manual for Roads and Bridges. Specifically we do not recognise the separation of assets of 'international' and 'national' importance as those of 'very high' and 'high' significance. Although we recognise the accolade of World Heritage, as a regulatory body providing advice to and on behalf of the Government we operate under the provisions of the statutory law of this country. As such, and in line with paragraph 194 (b) of the NPPF, the assets we consider to be of the highest significance and importance, when considering impact under all relevant laws, regulations and policies, would include scheduled monuments.

Despite these shortcomings the Heritage Statement and relevant chapters of the Environment Statement make note of some limited measures to offset any harm caused to the scheduled monuments, specifically the preservation of an open space within the confines of the Roman villa scheduled monument, the perceived retention of the alignment of the Roman road (although we would contest that this is adequately, effectively or appropriately achieved in the final design) and the use of 'appropriate materials and finishes' with regard to the dwellings in the area of the monument. It is our view that these measures do not go far enough to offset the harm caused to the nationally important heritage assets that will be affected by the development, by adequately revealing or enhancing their significance. We would expect to see a more considered approach to preserving the alignment of the Roman road (we note the suggestion of a green corridor along the route of the road in the Allen Pyke opportunities and constraints drawing which we feel could be a more appropriate starting point to any such approach), and a design which would not pose a risk to any of the standing earthwork remains of the road. Further enhancement and revealing of the significance of the Roman villa and road site would be required (other than simply leaving the site as open land), and opportunities for interpretation should be explored such as, but not limited to: the commissioning of interpretive public art, interpretation panels, permanent display of artefacts recovered from the site within the development (perhaps within the community centre/nursery), road/estate names reflecting the historic nature of the site, etc. Consideration should be demonstrated in respect of the boundary treatment around the monument and provision for on-going land management of the open space that forms the designated area, through an agreed management plan. Attention would also need to be given to the fact that any significant but undesignated archaeological remains encountered as a result of any development which are associated with the scheduled monument would be subject to



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the same policies for designated heritage assets (NPPF, paragraph 194, footnote 63). Protection measures would need to be provided to Historic England with regard to the scheduled Roman site to ensure that no damage is incurred to the designated heritage asset during construction phases.

To conclude, although the harm caused the significance of the three scheduled monuments by the full planning application ('Phase 1') is slight, further work can be done to offset this harm and we suggest it would be prudent for the applicant to engage with us to discuss ways in which this can be achieved. With regard to the outline application ('Phases 2, 3 & 4'), as we do not feel allocation of this land for development has yet been justified through the adoption of a local plan and given that 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), we do not feel we can support these proposals at this time or in their present form.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 184, 190, 192, 193 and 194 of the NPPF.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely

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