



Historic England

Mr Gary Christie
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Direct Dial: 020 7973 3739

Our ref: P01504553

20 June 2022

Dear Mr Christie

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

**THE SOUTH DOWNS COLLEGE, COLLEGE ROAD, PURBROOK,
WATERLOOVILLE, PO7 8AA
Application No. APP/22/00439**

Thank you for your letter of 7 June 2022 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.

Summary

The proposed development site lies adjacent to the buried but well preserved remnants of a Roman villa complex fronting the Chichester to Bitterne road. The scheduled archaeological remains sit well within the rural landscape that would have been evident at the time of their construction. The development proposals have the potential to cause harm to the significance of this designated heritage asset through impacting its rural setting. The alignment of an undesignated portion of the Roman road is also at risk due to the proposed site layout. The potential for harm to the setting is not understood and needs to be presented in a views assessment. There may also be ways to mitigate the impact on the undesignated heritage asset, through modifications to the design of the scheme.

Historic England Advice

The development is located 70m west of a Scheduled Roman site SW of Littlepark Wood (NHLE: 1001859). It is also sited c.1km to the north-east of Fort Purbrook, including the covered way to the east (NHLE: 1001842 - also Grade II* listed). Despite being located within the fort's 'field of fire', this asset will not be considered within the below advice, due to the distance of the proposed development combined with the fact



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the land is suitably screened.

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

The villa estate

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.

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.

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 Roman road

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.



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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.

Setting

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. They help form an understanding of the function and layout of these estates, and this is certainly the case for 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.

Impact of the proposals

The application concerns the redevelopment of southern section of the South Downs College site, which is currently occupied by a car park. The proposal concerns the construction of 102 dwellings comprising 56 No. 2, 3 & 4 bed houses and 46 No. 1 & 2 bed flats with associated parking, landscaping, waste and cycle storage.

Archaeology

Works on the site comprising demolition of existing hardstanding and infrastructure, the construction of new buildings, associated services and landscaping will have an impact on any surviving archaeological remains - which may have associations with the nationally important Scheduled Monument to the east of the site.

We would defer to the view of the Hampshire County Council Archaeological Adviser in relation to this, although it is likely that any remains associated with the scheduled site to the east are likely to be considered non-designated heritage assets equivalent to a Scheduled Monument.

Setting of the Scheduled Monument

The construction of a new development here has the potential to cause harm to the setting of the scheduled Roman villa and road.



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These designated heritage assets presently existing within a rolling, rural landscape similar to that which would have existed at the time of their construction. Should the development be visible from the villa site it could disturb this association through the imposition of modern development along its western periphery.

Although the portion of the Roman road that is projected to pass through the development site is not scheduled in its own right, its association with the monument could see it considered as a non-designated heritage asset of equivalence to a Scheduled Monument. The presently proposed layout for the new development shows a road and some property boundaries intersecting with the alignment of the Roman road, severing the visual relationship between this part of the road and the scheduled portion in the fields to the east.

Policy Considerations

Statutory Protection and Government Policy

The Roman villa and associated road is protected as a Scheduled Monuments under the 1979 Ancient Monuments and Archaeological Areas Act on account of its national importance and archaeological, architectural and historical 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.

National Planning Policy Framework

One of the principal objectives of the National Planning Policy Framework (NPPF 2021) is the conservation of historic environment (paragraph 20).

The following sections of the NPPF are of relevance to this planning application:

- Heritage assets are an irreplaceable resource and should be conserved appropriately to preserve their significance and to allow the continued enjoyment of existing and future generations (Paragraph 189);
- A decision-maker should identify and assess the particular significance of the heritage assets that are affected by a proposal. They should take account of this assessment to avoid or minimise conflict between the heritage assets' conservation and any aspect of the proposal (Paragraph 195);
- Paragraph 194 requires the applicant to describe the significance of any



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- heritage assets affected, including any contribution made by their setting. This may also include, where, necessary, the need to undertake a field evaluation;
- Great weight should be given to the conservation of designated heritage assets. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alterations or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification (Paragraphs 199 and 200);
 - Footnote 68 (of Paragraph 200) makes clear that undesignated archaeological assets of national importance will be subject to the same policies as designated heritage assets;
 - Developers should be required to record and advance understanding of the significance of any heritage assets to be lost, in manner appropriate to their importance and impact; however the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted (Paragraph 205).

Local Planning Policy

Planning policy for the proposed development site is provided by the Havant Borough Council Local Plan, made up of the Local Plan (Core Strategy) adopted March 2011 and the Local Plan (Allocations) adopted July 2014. The Local Plan (Core Strategy).

Key policies include:

- Local Plan (Core Strategy) Policy CS11 Protecting and Enhancing the Special Environment and Heritage of Havant Borough - which references both designated and undesignated heritage assets and;
- Local Plan (Allocations) Policy DM20 Historic Assets - which concerns development that conserves and enhances historic assets and details concerning the provision and content of Heritage Statements.

It should be noted that Havant are currently reviewing the Local Plan (Allocations) Policy in relation to land adjacent to the application site, to which Historic England has been consulted and provided advice.

Historic England's position

The proposed development has the potential to harm the significance of the Roman villa and road Scheduled Monument, through impacting its setting (NPPF 199, 200).

It is our view, however, that any such harm could be mitigated by retaining the tree screening that is currently evidence around the application site. In addition to this it will be important to ensure building heights are not such that they will be visible above



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the tree screening from the villa site (NPPF 189).

The nature of this potential harm and proposed mitigation measures is not yet fully understood. As such we would request that views are submitted with the application from the site of the villa - specifically the main villa complex within the scheduled area - looking towards the development. Wireline views would be acceptable to demonstrate the impact, unless the buildings are visible above the screening treeline in which case the views should be rendered. This will assist in assessing the level of impact on the setting of the Scheduled Monument (NPPF 195).

As previously commented, we would defer to the Hampshire County Archaeological advisers with regard to the impact of the development on non-designated heritage assets/archaeological remains. It is clear, however, that a programme of archaeological work will be required in relation to this development (NPPF 194, 205).

We would note, however, that minimal effort has been made to reference the alignment of the Roman road within the planned layout. Indeed, some of the property boundaries of the buildings to the north and south of the course of the Roman road, encroach onto its alignment. We feel more could be done to reflect or highlight the historic alignment of the ancient road. This could include changing the alignment of the new road and adjusting the location/configuration of housing around it or looking at more tangible ways to mark out the alignment of the road onto the hard and/or soft landscaping (NPPF 200, fn 68).

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 189, 194, 195, 199, 200 & 205 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 there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Iain Bright

Inspector of Ancient Monuments

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