

From: Martyn White
Sent: 05 April 2024 17:07
To: Jessica Riches
Subject: AL/11/24/OUT

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Land East of Westergate, Westergate

Hybrid application consisting of: 1) Outline permission for all matters reserved (except access) for up to 400 No dwellings and associated works and 2) Full planning permission for alterations to site access off Westergate Street and through Pine Close and east-west link road including a bridge over the Lidsey Rife. This application also lies within the parish of Barnham, falls within Strategic Site SD5, CIL Zone 1 (Zero Rated), affects the setting of listed buildings, affects the character and appearance of the Eastergate Church Lane Conservation Area, affects public rights of way. This application is the subject of an Environmental Statement.

I have reviewed the information provided as part of the application in order to prepare some consultation comments for you. As you are aware the application is close to heritage assets, which requires a careful assessment to be undertaken in accordance with the NPPF and the Planning (Listed Building and Conservation Areas) Act 1990.

As part of paragraph 200 of the NPPF, Local Planning Authorities require an applicant to describe the significance of any heritage assets affected by their proposals, including any contribution made by their setting, in determining applications. This is normally provided in the form of a heritage statement i.e. one which describes the significance of the assets affected (including the contribution made by their setting), along with an assessment and understanding of the potential impact of the proposals on that significance.

I note that there is a built heritage and archaeological desk based assessment within the submitted documents. Having reviewed this it would appear that the majority of the information about the built heritage assets is contained within the appendices, as opposed to the main part of the document, which is itself predominantly focused on archaeology.

Within the appendices there is a greater focus on the listed buildings but there is a very limited assessment of the two conservation areas. It is not satisfactory to copy and paste the councils description of the conservation areas, especially when they are so simple and clearly out of date.

Whilst some form of significance of the built heritage assets is identified, it does not accord with the definition as identified within the NPPF. It is not just the level of significance, which is required, but also how it is derived i.e. architectural, historical, artistic or archaeological interest (see the NPPF definition).

I am also unable to find a clear assessment of the setting of the heritage assets, especially the conservation areas, nor a full assessment of the impact of the development on the setting of the heritage assets/the assets significance – it is clear that the development will not directly impact upon the fabric of the buildings. There are references to views towards certain heritage assets, but this is not the extent of the assessment of impact upon setting.

A heritage statement should be prepared in accordance with the clear guidance on the production of a heritage statement provided by historic England (Historic England Advice Note 12). It is also recommended that Historic Environment Good Practice Advice in Planning 3: The Setting of Heritage Assets is also reviewed.

Martyn White

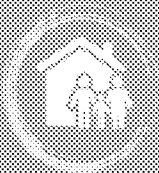
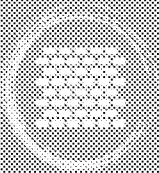
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