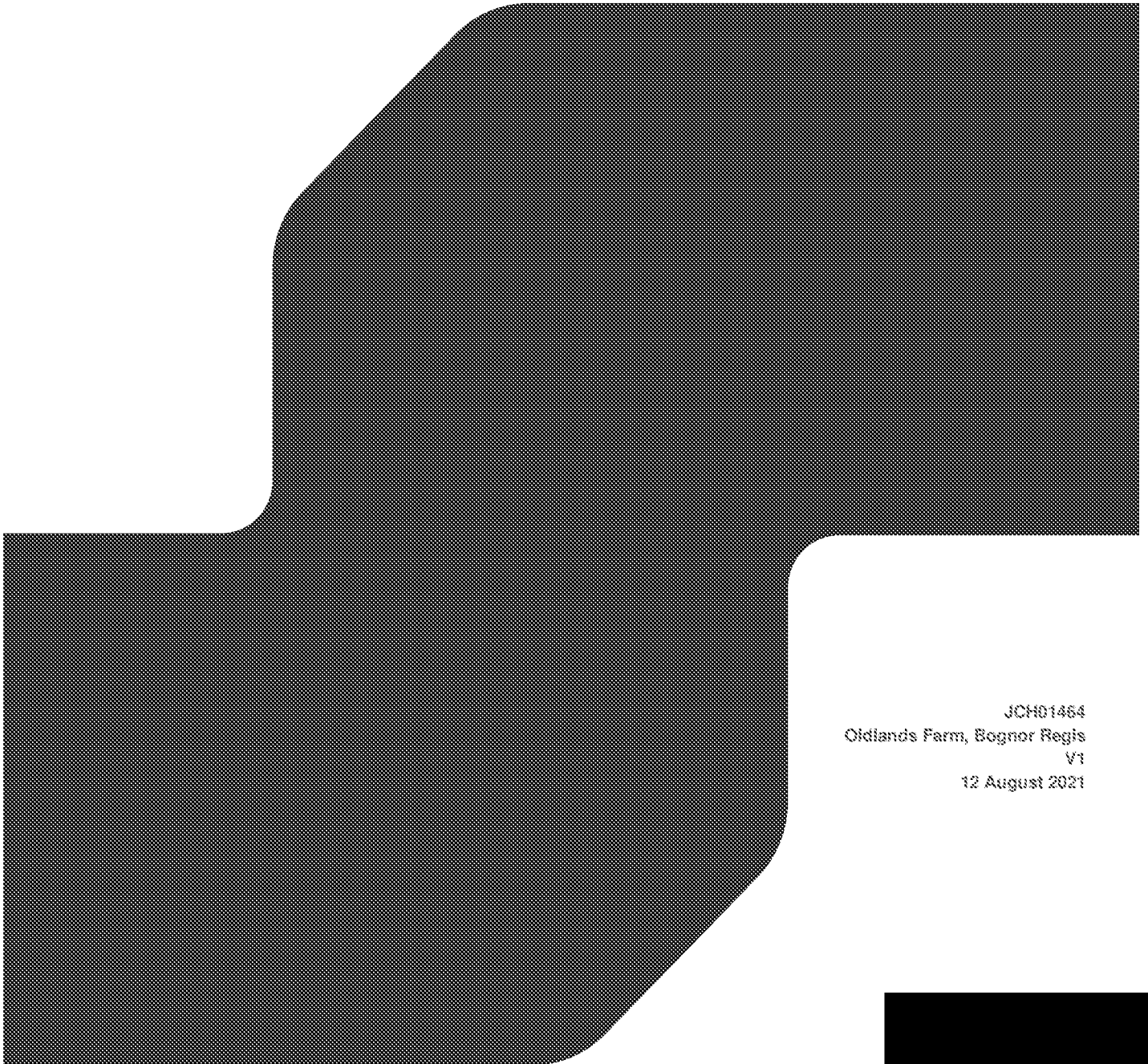


OLDLANDS FARM, BOGNOR REGIS

Built Heritage Statement



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Oldlands Farm, Bognor Regis
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12 August 2021

REPORT

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EXECUTIVE SUMMARY

This Built Heritage Statement has been prepared on behalf of Lysander by RPS Consulting Services UK Ltd. It has been prepared to assess the built heritage sensitivities of land at Oldlands Farm, Bognor Regis (the Site).

This report has been prepared to identify the built heritage assets potentially affected by the proposed development and assess their significance, with consideration given to any contribution made by their settings. This report has been prepared to support a live application in response to consultation comments from the Conservation Area Advisory Committee, who raised concerns regarding the potential impact of the proposals on the Shripney Conservation Area. It subsequently provides an assessment of how, and to what extent, the proposed development will affect their significance.

The site itself does not contain any designated or non-designated heritage assets. Some 650m north-west of the site lies the Shripney Conservation Area, and within that lie five listed buildings; Shripney Manor (NHLE: 1233211), Studio Barn (NHLE: 1353831), Rambler Cottage (NHLE: 1027697), Cottage to the North West and in the Grounds of Rambler Cottage (NHLE: 1027698) and Shripney House (NHLE: 1276704).

The proposed development, by virtue of its visual and physical separation from the identified heritage assets, will not cause any impact on their significance. It should be noted that the Conservation Officer's consultation response to the planning application states that "*the proposals will not harm the significance of the Conservation Area*".

This assessment is sufficient in terms of paragraph 194 of the NPPF (July 2021) to inform a decision on the suitability of the proposals in respect of built heritage matters.

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1 INTRODUCTION

- 1.1 This Built Heritage Statement has been researched and prepared by RPS, on behalf of Lysander to support a Planning Application for the erection of a warehouse (Use Class B8) with ancillary office, associated vehicle parking, van storage, plant, ancillary structures, lighting landscaping and infrastructure works including earthworks to facilitate flood compensation area at Oldlands Farm, Bognor Regis. This report has been prepared to support a live application in response to consultation comments from the Conservation Area Advisory Committee, who raised concerns regarding the potential impact of the proposals on the Shripney Conservation Area.
- 1.2 This report makes reference to the relevant legislation contained within the Planning (Listed Buildings and Conservation Areas) Act 1990 and both national and local planning policy. In addition, relevant Historic England guidance notably The Setting of Heritage Assets and Conservation Principles has been consulted to inform the judgements made. Relevant information, including the listing citations for the relevant heritage assets have also been consulted in preparing this Built Heritage Statement. The conclusions reached in this report are the result of detailed historic research, a walkover survey of the Site and publicly accessible locations in the surrounding area, historic map studies and the application of professional judgement.
- 1.3 The findings of this report are based on the known conditions at the time of writing. All maps, plans and photographs are for illustrative purposes only.

2 LEGISLATIVE AND PLANNING POLICY FRAMEWORK

- 2.1 The current national legislative and planning policy system identifies, through the National Planning Policy Framework (NPPF), that applicants should consider the potential impact of development upon 'heritage assets'. This term includes: designated heritage assets which possess a statutory designation (for example listed buildings and conservation areas); and non-designated heritage assets, typically compiled by Local Planning Authorities (LPAs) and incorporated into a Local List or recorded on the Historic Environment Record.

Legislation

- 2.2 Where any development may affect certain designated heritage assets, there is a legislative framework to ensure proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.3 The relevant legislation in this case extends from section 66 of the 1990 Act which states that special regard must be given by the decision maker, in the exercise of planning functions, to the desirability of preserving or enhancing listed buildings and their setting.
- 2.4 The meaning and effect of these duties have been considered by the courts in recent cases, including the Court of Appeal's decision in relation to *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council* [2014] EWCA Civ 137.
- 2.5 The Court agreed within the High Court's judgement that Parliament's intention in enacting section 66(1) was that decision makers should give 'considerable importance and weight' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.
- 2.6 Section 69(1) of the Act requires LPAs to 'determine areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance' and to designate them as conservation areas. Section 69(2) requires LPAs to review and, where necessary, amend those areas 'from time to time'.
- 2.7 For development within a conservation area section 72 of the Act requires the decision maker to pay '*special attention [...] to the desirability of preserving or enhancing the character or appearance of that area*'. The duty to give special attention is considered commensurate with that under section 66(1) to give special regard, meaning that the decision maker must give considerable importance and weight to any such harm in the planning balance. However, unlike the parallel duty under section 66, there is no specific protection for the setting of a conservation area.

National Planning Policy

National Planning Policy Framework (Ministry of Housing, Communities and Local Government, July 2021)

- 2.8 The NPPF is the principal document that sets out the Government's planning policies for England and how these are expected to be applied.
- 2.9 It defines a heritage asset as a: 'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'. This includes both designated and non-designated heritage assets.
- 2.10 Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage

assets are '*an irreplaceable resource, and should be conserved in a manner appropriate to their significance*'.

- 2.11 For proposals that have the potential to affect the significance of a heritage asset, paragraph 194 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 195, which requires LPAs to take this assessment into account when considering applications.
- 2.12 Under '*Considering potential impacts*' the NPPF emphasises that '*great weight*' should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.
- 2.13 Paragraph 201 states that where a development will result in substantial harm to, or total loss of, the significance of a designated heritage asset, permission should be refused, unless this harm is necessary to achieve substantial public benefits, or a number of criteria are met. Where less than substantial harm is identified paragraph 202 requires this harm to be weighed against the public benefits of the proposed development.
- 2.14 Paragraph 203 states that where an application will affect the significance of a non-designated heritage asset, a balanced judgement is required, having regard to the scale of harm or loss and the significance of the heritage asset.
- 2.15 Paragraph 206 notes that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. It also states that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset should be treated favourably.
- 2.16 Furthermore, paragraph 207 states that not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. When determining the impacts arising from the loss of a building or element that does positively contribute, consideration should be given to the relative significance of that building and the impact to the significance of the Conservation Area or World Heritage Site as a whole.

National Guidance

Planning Practice Guidance (DCLG)

- 2.17 The Planning Practice Guidance (PPG) has been adopted in order to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.
- 2.18 Key elements of the guidance relate to assessing harm. It states that substantial harm is a high bar that may not arise in many cases and that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset's special interest. It is the degree of harm, rather than the scale of development, that is to be assessed.

GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

- 2.19 This document provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in

considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
6. Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

GPA3: The Setting of Heritage Assets (Second Edition; December 2017)

- 2.20 This advice note focuses on the management of change within the setting of heritage assets. This document replaces GPA3: The Setting of Heritage Assets (March 2017) and Seeing History in the View (English Heritage, 2011) in order to aid practitioners with the implementation of national legislation, policies and guidance relating to the setting of heritage assets found in the 1990 Act, the NPPF and PPG. The guidance is largely a continuation of the philosophy and approach of the 2011 and 2015 documents and does not present a divergence in either the definition of setting or the way in which it should be assessed.
- 2.21 As with the NPPF the document defines setting as *'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'*. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset, or the ability to appreciate that significance. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.
- 2.22 While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, and thus the way in which an asset is experienced, setting also encompasses other environmental factors including noise, vibration and odour. Historical and cultural associations may also form part of the asset's setting, which can inform or enhance the significance of a heritage asset.
- 2.23 This document provides guidance on practical and proportionate decision making with regards to the management of change within the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a heritage asset may have positive or neutral effects.
- 2.24 The document also states that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting, and that different heritage assets may have different abilities to accommodate change without harming their significance. Setting should, therefore, be assessed on a case-by-case basis.
- 2.25 Historic England recommends using a series of detailed steps in order to assess the potential effects of a proposed development on significance of a heritage asset. The 5-step process is as follows:
1. Identify which heritage assets and their settings are affected;

2. Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
3. Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
4. Explore ways to maximise enhancement and avoid or minimise harm; and
5. Make and document the decision and monitor outcomes.

HEAN12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (October 2019)

- 2.26 The purpose of this advice note is to provide information on how to assess the significance of a heritage asset. It also explores how this should be used as part of a staged approach to decision-making in which assessing significance precedes designing the proposal(s).
- 2.27 Historic England notes that the first stage in identifying the significance of a heritage asset is by understanding its form and history. This includes the historical development, an analysis of its surviving fabric and an analysis of the setting, including the contribution setting makes to the significance of a heritage asset.
- 2.28 To assess the significance of the heritage asset, Historic England advise to describe various interests. These follow the heritage interest identified in the NPPF and PPG and are: archaeological interest, architectural interest, artistic interest and historic interest.
- 2.29 To assess the impact to the significance of a heritage asset Historic England state that it is necessary to understand if there will be impacts to built fabric or the setting of a heritage asset and how these contribute to the heritage asset's overall significance. Where the proposal affects the setting, and related views, of a heritage asset, or assets, it is necessary to clarify the contribution of the setting to the significance of the asset, or the way that the setting allows the significance to be appreciated.
- 2.30 This enables an assessment of how proposals will affect significance, whether beneficial or harmful. It also states that efforts should be made to minimise harm to significance through the design process, with justification given to any residual harm.

Local Planning Policy

- 2.31 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations. The Arun Local Plan (2011-2031) was adopted in 2016. The Local Plan contains a specific Conservation Areas Policy, HER DM3, which states:

In order to preserve or enhance the character or appearance of the Conservation Area, planning permission or relevant consent will normally be granted for proposals within or affecting the setting of a Conservation Area, provided that:

- a. *New buildings and structures acknowledge the character of their special environment in their layout, form, scale, detailing, use of materials, enclosure and the spaces created between buildings;*
- b. *Alterations or additions to existing buildings are sensitively designed, constructed of appropriate materials and are sympathetic in scale, form and detailing and retain or emphasise the features and qualities of the existing buildings, townscape or streetscape in the area;*
- c. *Traditional features such as shop fronts, walls, railings, paved surfaces and street furniture are retained and restored;*
- d. *Unsympathetic features are removed and missing features are restored or reinstated;*

- e. *It retains historically significant boundaries, important open spaces and other elements of the area's established pattern of development, character and historic value, including gardens, roadside banks and verges;*
- f. *It does not harm important views into, out of or within the Conservation Area.*

Within Conservation Areas, permission for development involving demolition or substantial demolition will only be granted, subject to conditions, if it can be demonstrated that:

- g. *The structure to be demolished makes no material contribution to the special character or appearance of the area; or,*
- h. *It can be demonstrated that the structure is wholly beyond repair or incapable of beneficial use; or*
- i. *It can be demonstrated that the removal of the structure and its subsequent replacement would lead to the enhancement of the area; and*
- j. *Permission has been granted for the redevelopment of the site.*

3 HISTORIC BUILT ENVIRONMENT APPRAISAL

Site Assessment

- 3.1 The site is located on the north eastern built edge of Bognor Regis. The Site comprises a number of irregular pasture fields bound in the north and west by Charles Purley Way (A259) and in the south by modern commercial development. The Site is bound in the east by a rail line.
- 3.2 The vicinity of the Site is characterised primarily by irregular agricultural fields to the north, east and west. To the south lies an expansive area of modern commercial and light industrial development. The character of the Site and immediate vicinity can be characterised as edge of settlement, giving way to the semi-rural hinterland of Bognor Regis. The village of Shripney, centred on the Shripney Conservation Area, lies c.650m to the west of the Site.

Historic Development

- 3.3 In the post-Medieval period cartographic sources are useful in illustrating the historic land use of the Site and vicinity and past phases of built development.
- 3.4 The 1880 Ordnance Survey (OS) map (Fig. 1) shows the site as arable land. The Bognor Regis branch of the London, Brighton and South Coast railway line can also be seen running along the eastern edge of the site.
- 3.5 Shripney is shown as a hamlet clustered around the Manor on the west side of Shripney Road (now the A29). The Site is separated from the historic built core of Shripney by extensive intervening agricultural land and does not form part of the immediate bounds of the settlement.

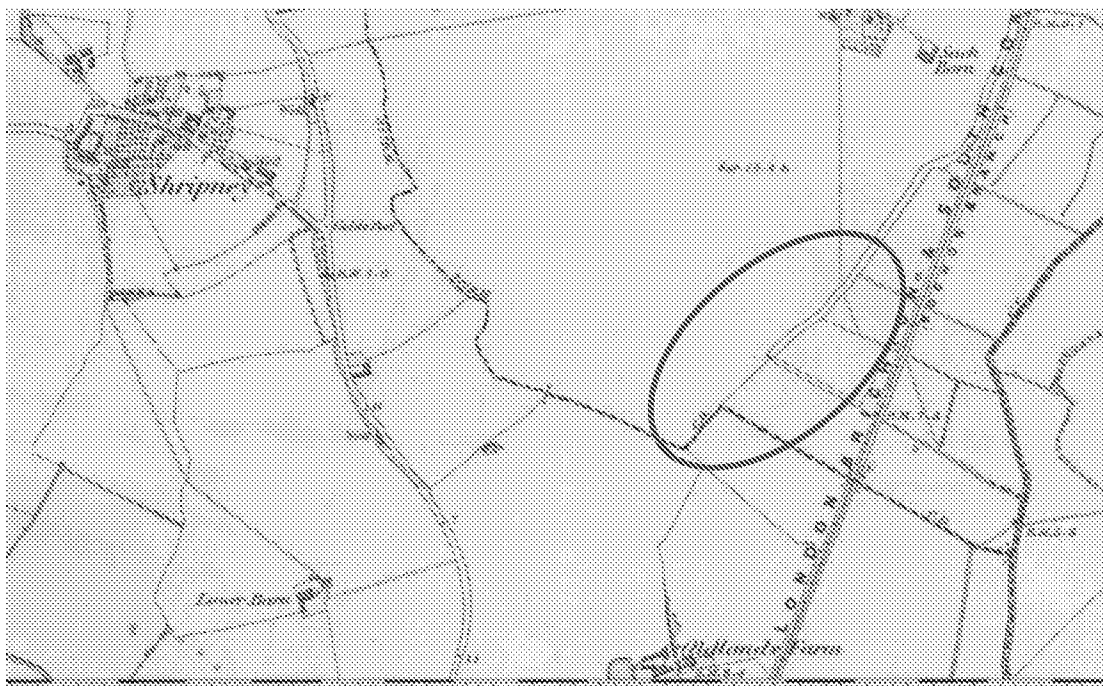


Figure 1 - 1880 OS Map.

- 3.6 The 1899 OS map shows no notable change from the 1880 Edition. The 1914 OS Map (Fig. 2) shows a greater degree of development on the east side of Shripney Road. There is no change to the Site itself, though the buildings at Oldlands Farm have been replaced to form a courtyard.

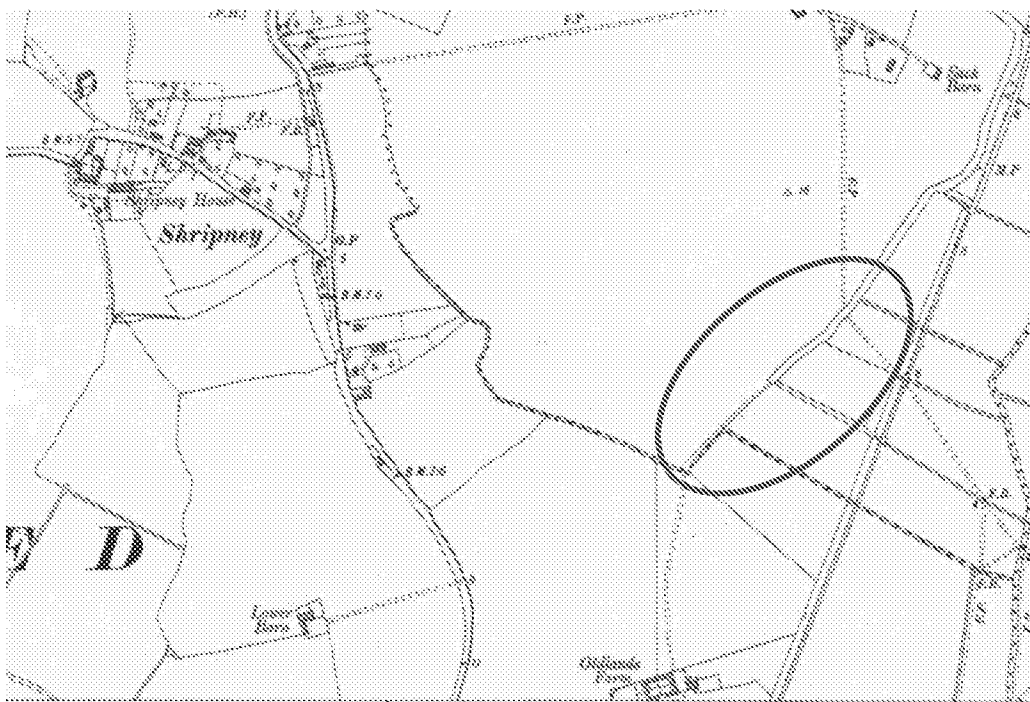


Figure 2 - 1914 OS Map.

- 3.7 The 1944 map (Fig. 3) shows no change to the Site. Additional development has been laid out in Shripney, east of Shripney Road, and within the outlying ribbon of development on Shripney Lane.

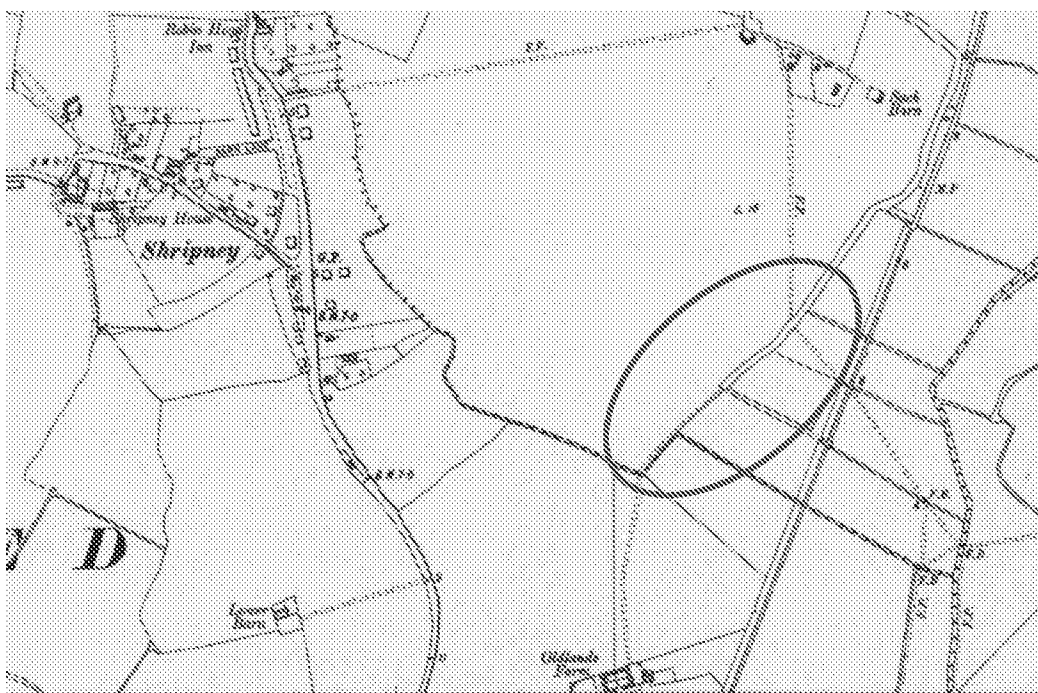


Figure 3 - 1944 OS Map.

- 3.8 The 1952 map (Fig. 4) shows the development that was laid out in 1944 as being built out. This map does not indicate any notable change within the Site.

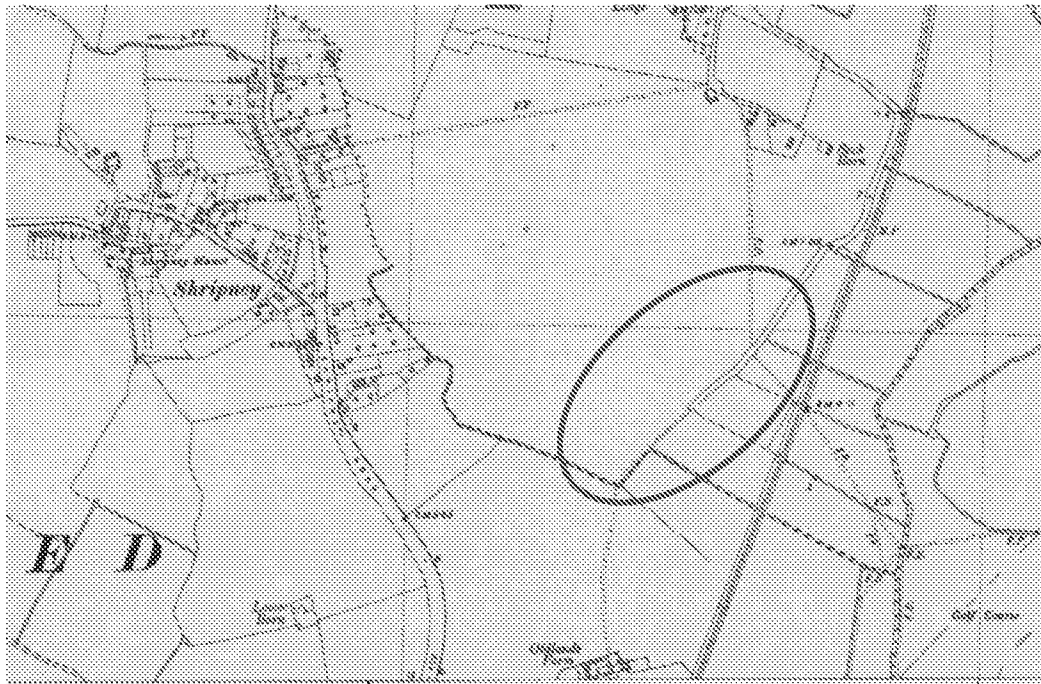


Figure 4 - 1952 OS Map.

- 3.9 The 1961 map (Fig. 5) shows some limited infilling within Shripney, but no other changes on the Site or within its vicinity.

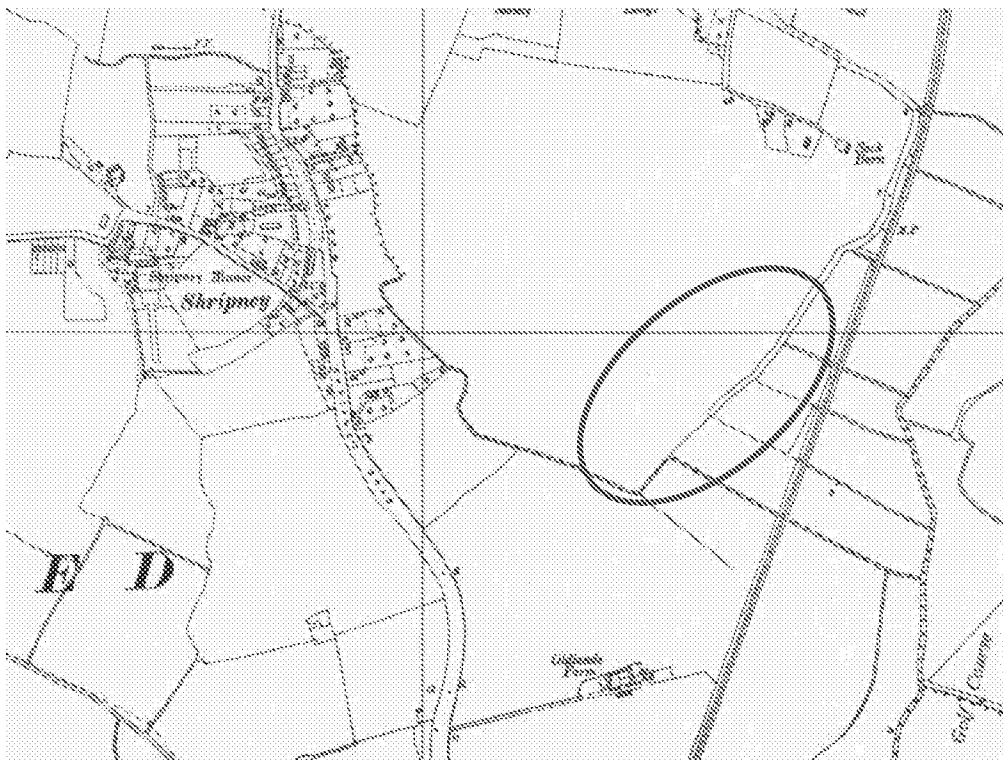


Figure 5 - 1961 OS Map.

- 3.10 The 2001 aerial photograph (Fig. 6) shows the expansion of the village of Shripney to the north, and industrial/logistics development to the south of Oldland's Farm. There is no change to the Site itself.



Figure 6 - 2001 Aerial Photograph.

- 3.11 The 2021 aerial photograph shows the construction of the A259 on farmland between Oldland's Farm and Shripney, severing the Site from the wider arable land.



Figure 7 - 2012 Aerial Photograph.

- 3.12 The 2015 aerial photograph (Fig. 8) shows the construction of two warehouses immediately south of the site. The Site is now enclosed on all sides by the railway line, the A259 and modern commercial built development.



Figure 8 - 2015 Aerial Photograph.

- 3.13 The 2019 aerial photograph (Fig. 9) shows little change in the area. The site walkover (August 2021) confirmed that additional warehousing has been constructed since 2019 to the west of the A29 (yellow highlight, Fig.9).



Figure 9 - 2019 Aerial Photograph.

Assessment of Heritage Assets

Identification of Heritage Assets

- 3.14 The Site does not contain any designated or non-designated built heritage assets.
- 3.15 The Shripney Conservation Area (CA) is located c.650m north-west of the Site, and is physically and visually separated from the site by the A259, agricultural land and intervening built development. The proposals represent the alteration of a minor element of the wider edge of settlement or semi-rural setting of the conservation area.
- 3.16 The CA includes five Grade II listed buildings:
- Shripney Manor (NHLE: 1233211)
 - Studio Barn (NHLE: 1353831)
 - Rambler Cottage (NHLE: 1027697)
 - Cottage to the North West and in the Grounds of Rambler Cottage (NHLE: 1027698)
 - Shripney House (NHLE: 1276704)
- 3.17 The District of Arun maintains a formal 'local list' of non-designated built heritage assets that merit consideration in the planning process as a result of their limited architectural and/or historic interest. There are a number of locally listed buildings within Shripney Conservation Area:
- Former Barn, Old Moat Close
 - Former Store, Old Moat Close
 - Old Cottage
 - Walnut Tree Cottage

- Rose Cottage

- 3.18 Due to the physical and visual separation between the Site and both the listed and locally listed buildings, the Site forms no part of how the significance of these buildings are experienced or understood within their close and immediate settings. The Site has no known or legible historical or functional relationship with any of these designated and non-designated heritage assets and is considered to make no contribution to their significance. No potential impacts to the significance of the listed and locally listed buildings have been identified and these buildings are therefore not carried forward for detailed individual assessment.
- 3.19 The Conservation Area Advisory Committee identified Shripney Conservation Area as having the potential to be affected by the proposed development, stating *"the development will impact adversely on the open rural character of the landscape to the north with a resultant negative impact on the setting of the historic settlement"*. As such, this report has been prepared to assess any potential impact on the CA. It should be noted, however, that unlike listed buildings CA's do not have protected settings.

Shripney Conservation Area

- 3.20 The Shripney CA comprises the development on either side of Shripney Lane. It does not extend eastwards to meet the A29. The built form has a low density, particularly south of the lane, which comprises the grounds of Shripney Manor.



Figure 10 - A thatched brick and flint property on Shripney Lane.

- 3.21 The character of the CA is that of a traditional rural village, with many mature trees and green, densely planted gaps between the buildings. The buildings are a mix of historic and 20th Century infill development. The palette of materials used on the historic built form includes brick, flint, render, plain tiles, slate and thatch, with front walls generally being of brick and flint construction.



Figure 11 - An example of built form within the CA.

- 3.22 The significance of the CA is derived from the architectural and historic interest its historic buildings, some of which are included on the National Heritage List for England, and the legibility of the settlement's phases as a historically evolved, traditional agricultural village. The CA retains its quintessential rural-village character and legible relationship with Shripney Manor today, despite a variety of infill developments within the CA and built expansion along its formerly agricultural periphery.

Setting

- 3.23 The CA is enclosed by densely planted property boundaries, treelines and built form. The CA therefore lacks any wide-ranging views to the surrounding landscape, which as a result forms only a limited element of the experience of being within the CA itself.
- 3.24 Due to this sense of enclosure, the CA does not have a setting which can be appreciated from within the CA, however, as one approaches the CA the arable land immediately surrounding it does contribute towards its rural character and sense of separation. The Site does not form part of this setting due to the distance between it and the CA and the lack of any visual link between the two. There is no appreciation of the CA, or its character and appearance from within the Site.

Proposals

- 4.2 The proposed warehouse will have a maximum roof parapet height of 15.9m from finished floor level, and an eaves height of 13.1m. The warehouse has been designed with the office space on the western elevation to create an active frontage to the A259.
- 4.3 The proposed van storage deck would be laid out over four levels (ground plus three).
- 4.4 Access to the site will be via the existing access road to the south-west of the site. A public footpath runs though the site, which is proposed to be diverted around the northern and eastern edges of the Site.
- 4.5 A flood compensation area is proposed north of the A259 but this does not require any built form to be constructed.



Assessment of Impact

- 4.6 A site visit to Shripney Conservation Area confirmed that the Site is not visible from any part of the Conservation Area. As such, it does not form part of its setting and there will be no impact on the significance of the Conservation Area as a result of the proposals.
- 4.7 The concern raised by the Conservation Area Advisory Committee was that the proposals would *"negatively impact on the setting of the historic settlement"*. The setting of the Conservation Area, as discussed above, is formed by the rural approach to the settlement, however, this is not statutorily protected. The setting of the CA has changed significantly over time due to the new and upgraded road infrastructure and the introduction of warehouse development both immediately south of the CA and within the wider context of the CA.
- 4.8 The site has been separated from the wider arable landscape by the A259, leaving a plot enclosed by road, rail and built development. The proposed distribution centre is an extension to the existing warehousing south of the site and as such the character of the area will not be significantly altered. The proposed development would not affect the current appreciation of the CA within the wider landscape as it does not introduce a new form of development.
- 4.9 Overall, it is considered that there will be **no impact** on the significance of the Conservation Area as a result of the proposed development. It should be noted that the Conservation Officer's consultation response to the planning application agrees with this conclusion and states that *"the proposals will not harm the significance of the Conservation Area"*.

5 CONCLUSION

- 5.1 This Built Heritage Statement has been prepared in order to assess the potential impact on the historic built environment arising from the proposed development at land north of Oldlands Farm.
- 5.2 This Built Heritage Statement meets the requirements of the NPPF and local planning policy and provides sufficient information and assessment to identify the potential impacts arising from the development of the Site on the historic built environment.
- 5.3 The proposals will not impact the significance of the Shripney Conservation Area, or the listed and locally listed buildings within it. It should be noted that the Conservation Officer's consultation response to the planning application states that "*the proposals will not harm the significance of the Conservation Area*". As such, the proposals are considered to comply with the relevant national and local policies and guidance.

