# **Chapter F**

**Archaeology and Cultural Heritage** 

# Land West of Bersted Environmental Statement

**Chapter F: Archaeology and Cultural Heritage** 

September 2022

Cotswold Archaeology Stanley House, Walworth Road Andover, Hampshire SP10 5LH

www.cotswoldarchaeology.co.uk

14714/02/SSL/NSt 25598078v1

## **Contents**

F1.0	Introduction	1
	About the Author	1
F2.0	Policy Context	2
	Legislation	2
	National Policy	2
	Local Policy	3
	Technical Standards and Guidance	4
F3.0	Assessment Methodology & Significance Criteria	5
	Assessment Methodology	5
	Significance Criteria	6
	Consultation	11
	Assumptions and Limitations	11
F4.0	Baseline Conditions	13
	Existing Conditions	13
	Future Baseline	19
F5.0	Potential Effects	21
	Built-in Mitigation	21
	During Construction	21
	During Operation	22
F6.0	Mitigation and Monitoring	24
	During Construction	24
	During Operation	25
F7.0	Residual Effects	26
	During Construction	26
	During Operation	26
F8.0	Summary & Conclusions	27
F9.0	Abbreviations & Definitions	30
F10.0	References	31

## F1.0 Introduction

- F1.1 This chapter of the ES assesses the likely significant effects of the Proposed Development in terms of archaeology and built heritage (heritage assets), including designated heritage assets within the Development Site's environs.
- This chapter describes: the assessment methodology; the baseline conditions currently existing at the Development Site and in the surrounding area; the likely significant environmental effects; the mitigation measures required to prevent, reduce or offset any significant adverse effects; the likely residual effects after the mitigation measures have been employed.
- F<sub>1.3</sub> The chapter should be read in conjunction with the following technical appendices provided at Volume 2 to this ES:-
  - Appendix F1 Archaeological Desk-Based Assessment (Cotswold Archaeology 2008);
  - Appendix F2 Trial Trench Evaluation (Cotswold Archaeology 2009);
  - Appendix F3 Archaeological sensitivity note summarising the results of the evaluation (Cotswold Archaeology 2015);
  - Appendix F4 Settings assessment (Cotswold Archaeology 2020); and
  - Appendix F<sub>5</sub> Archaeology and Heritage Figures.
- F<sub>1.4</sub> Appendix F<sub>5</sub> comprises the following two figures:
  - Figure F1 Areas of Archaeological Sensitivity; and
  - Figure F2 Designated Heritage Assets.

#### **About the Author**

This chapter of the ES was prepared by Rebecca Wills, Senior Heritage Consultant for Cotswold Archaeology. Rebecca has worked professionally within the heritage sector since 2006, beginning her career as a field archaeologist before moving into consultancy in 2012. She has extensive experience of assessing and advising on a host of heritage-related matters, having prepared desk-based assessments, heritage statements, settings assessments, Written Schemes of Investigation and Environmental Statement chapters for a wide range of development projects across the UK. Rebecca is a Member of the Chartered Institute for Archaeologists.

## F2.0 Policy Context

F2.1 The archaeology and cultural heritage chapter has been undertaken within the context of relevant planning policies, guidance documents and legislative instruments. These are summarised below.

### Legislation

#### The Planning (Listed Buildings and Conservation Areas) Act 1990

- The Planning (Listed Buildings and Conservation Areas) Act 1990 (Ref. 1) places a duty upon the Local Planning Authority (or, as the case may be, the Secretary of State) to afford due consideration to the preservation of Listed Buildings and their settings (under Section 66(1)), and Conservation Areas (under Section 72(2)), in determining planning applications.
- F2.3 The Act states that 'in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest that it possesses' (Section 66).
- F2.4 The Act also states that with regard to development affecting Conservation Areas, the Local Planning Authorities should pay special attention to 'the desirability of preserving or enhancing the character or appearance of that area' (Part II, Section 72), with the statutory duty applicable to buildings and land within a Conservation Area.

### **National Policy**

#### National Planning Policy Framework (NPPF), 2021

- The principal national guidance on the importance, management and safeguarding of the historic environment recourse within the planning process is the NPPF, Section 16: Conserving and enhancing the historic environment (Ref 2). The aim of this section is to ensure that Local Planning Authorities (LPA), developers and owners of heritage assets adopt a holistic and consistent approach to conserving the historic environment.
- F2.6 Heritage assets include designated and non-designated sites, and policies within the NPPF relate to both the treatment of heritage assets themselves, and of their settings, both of which are a material consideration in development decision making.
- F2.7 Local planning authorities are urged to request applicants to describe the significance of any heritage assets affected by a proposed development, including any contribution made to significance by their setting. The level of detail required in the assessment should be proportionate to the importance of the assets, and no more than sufficient to understand the potential effects of the proposal on their significance.
- F2.8 The key tenets of the NPPF are 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. The more important the asset, the greater the weight should be (Paragraph 199);
  - significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Any harm or loss to the significance of designated assets should require clear and convincing justification. Substantial harm to, or loss of, a Grade II

listed building, park or garden should be exceptional. Substantial harm to, or loss of, designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, Grade I and II\* listed buildings, Grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional (Paragraph 200);

- where a proposed development will lead to substantial harm to (or total loss of significance
  of) a designated heritage asset, local planning authorities should refuse consent, unless it
  can be demonstrated that the substantial harm or total loss is necessary to achieve
  substantial public benefits that outweigh that harm or loss, or all of the following apply:
  - (a) the nature of the heritage asset prevents all reasonable uses of the site; and
  - (b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
  - (c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
  - (d) the harm or loss is outweighed by the benefit of bringing the site back into use (Paragraph 201).
- where proposed development will lead to less than substantial harm to the significance of a
  designated heritage asset, this harm should be weighed against the public benefits of the
  proposal including, where appropriate, securing its optimum viable use (Paragraph 202);
  and
- with regard to non-designated heritage assets, a balanced judgement will be required having due regard to the scale of any harm or loss, and to the significance of the heritage asset affected (Paragraph 203).

## **Local Policy**

Planning policy for Arun district is set out in the Adoption Arun Local Plan 2011-2031 (adopted July 2018; Ref. 3). Within this document, policies of relevance to heritage include:

- Policy HER SP1: The Historic Environment. This requires development to conserve and enhance heritage assets and their settings in a manner appropriate to their significance.
- Policy HER DM1: Listed Buildings. This requires proposals affecting Listed Buildings to
  preserve or enhance the historic character, qualities and special interest of the buildings,
  and to protect, and where possible enhance, the setting of the building.
- Policy HER DM6: Sites of Archaeological Interest. This states that there is a presumption in favour of preservation of scheduled and other nationally important monuments and archaeological remains. Where development would affect such a site, either directly or indirectly, or where a site proposed for development has the potential to contain heritage assets with archaeological interest, permission will only be granted where it can be demonstrated that development will not be harmful to the archaeological interest of these sites. Preservation in situ of archaeological remains is favoured option, although where assessment demonstrates that this is not necessary the developer may be required to make provision for a programme of investigation and recording. Developers are required to record any heritage assets to be lost (either wholly or in part) in a manner proportionate to their importance and possible impact, and to make this evidence publicly accessible.

#### **Technical Standards and Guidance**

- F<sub>2.10</sub> A summary of the relevant guidance documents is provided below, with further detail presented in ES Volume 2, Appendix F<sub>4</sub>.
- F2.11 NPPF Planning Practice Guidance: Historic environment (Ref. 4) provides further guidance on the policies within the NPPF, including the assessment of significance and the judgement left to the decision maker of whether the proposal would result in substantial harm. In the assessment of harm, it is stated that 'the degree of harm to the asset's significance rather than the scale of development' needs to be assessed;
- F2.12 Chartered Institute for Archaeologists (CIfA) *Standard and Guidance for Historic Environment Desk-Based Assessment* (Ref. 5) defines good practice for the execution and reporting of desk-based assessments, in line with other regulations and Code of Conduct of the CIfA;
- F2.13 Historic England's (formerly English Heritage) Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment (Ref. 5) sets out approaches to making decisions about the historic environment in England. The assessment of the significance within this document is based upon the following criteria defined within this guidance: evidential value, historical value, aesthetic value and communal value;
- Historic England's *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking* (Ref. 6) provides further information on good practice in implementing historic environment policy. It provides advice on the assessment of the significance of heritage assets in support of applications for planning permission and emphasises that the information required regarding heritage significance should be no more than necessary to inform the decision;
- F2.15 Historic England's Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Ref. 7) provides guidance on setting and development management, including assessment of the implications of development proposals, and recommends a stepped approach for assessing the implications of development proposals.

## F3.0 Assessment Methodology & Significance Criteria

### **Assessment Methodology**

#### **Determination of the Baseline**

F<sub>3.1</sub> The baseline has been determined through a previous DBA and trial trench evaluation, both undertaken 2008. The archaeological background and understanding of the Development Site has not changed since this time, with the results of the trial trench evaluation comprising the key source of current knowledge in relation to archaeological potential and sensitivities, and both of these surveys remain valid and reliable at the current date.

#### Desk-based assessment

- F<sub>3.2</sub> The DBA (ES Volume 2, Appendix F<sub>1</sub>) involved consultation of readily available archaeological and historical information from documentary and cartographic sources, and utilised a study area comprising a 500m radius around the Development Site. The following repositories of information were consulted in the preparation of the DBA:
  - National Heritage List for England for designated heritage assets, such as Listed Buildings and Scheduled Monuments;
  - West Sussex and Chichester District Historic Environment Records, for records of archaeological discoveries and heritage assets;
  - West Sussex Record Office, for historical maps and documents relating to the Development Site.

#### **Trial trench evaluation**

- F3.3 An archaeological evaluation (ES Volume 2, Appendix F2) was carried out within the Development Site between August and October 2008 in accordance with a Written Scheme of Investigation (WSI) approved by the archaeological advisor to Arun District Council. The WSI was guided in its composition by the 'Standard and Guidance for Archaeological Field Evaluation' (Institute for Archaeologists 2005) and other professional guidance documents.
- F3.4 The evaluation comprised 410 trenches, measuring 50m in length and 1.8m in width. Five of these trenches were extended in width or length to further expose and define identified archaeological features. The trenches were placed at random, although a greater density of trenching was implemented within areas of identified microtopography. Full details of the methodology and technical background are presented in Appendix F2.

#### Settings assessment

- F3.5 The Settings Assessment was carried out in July 2020, and is presented in Volume 2, Appendix F4 of the ES. The assessment followed the guidance provided in Historic England *Good Practice Advice in Planning: Note 3: The Setting of Heritage Assets* (Second Edition) to establish the setting of heritage assets within and around the Development Site; the contribution that setting makes to their heritage significance: and the potential effects of the development.
- F<sub>3.6</sub> The staged approach to settings assessment, as defined within the above guidance document, comprises:
  - Step 1 Identify which heritage assets and their settings are affected;

- Step 2 Assess the degree to which these settings and views make a contribution to the significance of the heritage assets, or allow it to be appreciated;
- Step 3 Assess the effects of the proposed development; and
- Steps 4 and 5 Explore ways to maximise enhancement and minimise harm, and to document the decision and monitor the outcome.
- F<sub>3.7</sub> The Settings Assessment identified the following heritage assets as being potentially affected by development, as a result of change to their settings:
  - Morells Farmhouse (Appendix F4: Figure 2, A);
  - Lagnersh Farmhouse (Appendix F4: Figure 2, **B**);
  - Neal Farmhouse (Appendix F4: Figure 2, **C**);

## Significance Criteria

#### **Assessment of the Significance of Heritage Assets**

- F<sub>3.8</sub> A heritage asset is defined by the NPPF (Ref. 1) 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. It includes designated heritage assets and assets identified by the local planning authority (including local listing)'.
- F3.9 Heritage significance is defined as the value of a heritage asset to this and future generations because of their heritage interest. That interest may be archaeological, architectural, artistic or historic in nature. The assessment of significance within this Chapter has been guided primarily by the key industry-standard policies and guidance contained in Conservation Principles (Ref. 6), where it is described with reference to the following four key forms of value:
  - **Evidential value** is derived from the potential of a place to yield evidence about past human activity. It is primarily associated with the physical remains or the historic fabric of the heritage asset. This value is proportionate to the potential of the asset to contribute to the understanding of the past. When there are no written records, such physical remains, including archaeological deposits, may provide the only source of information about the past;
  - **Historical value** derives from the ways in which past people, events and aspects of life can be connected through a site to the present. It can be illustrative or associative in attribution. The illustrative aspect relates to the ability of the asset to provide links and insights into past communities and their activities. The associative aspect derives from the association of the asset with a notable historic family, person, event or movement;
  - **Aesthetic value** is derived from the ways in which people draw intellectual and sensory stimulation from a place. This value may have developed through conscious design or be the result of the fortuitous evolution of the place over time. This aspect may include the physical form of the asset as well as its location within the setting; and
  - **Communal value**, which derives from the meaning of a place for the people who relate to it. The commemorative and symbolic aspects of this value reflect the meanings of a heritage asset for the people who draw part of their identity from it or have emotional links to it (such as memorials raised by community effort). The social aspect of this value is associated with places perceived as source of identity or distinctiveness and spiritual value is attached to places of worship.
- F<sub>3.10</sub> Significance derives not only from a heritage asset's physical fabric, but also from its setting. The setting of a heritage asset is defined as the surroundings within which it is experienced; its

Pg 6

extent is not fixed and may change as the asset and its surroundings evolve. However, setting is not a heritage asset in its own right, nor is it a heritage designation in its own right. Its importance lies in what it contributes to the significance of the heritage asset. This contribution may be positive, negative or neutral (i.e. does not contribute to the asset's significance).

- Paragraph 194 of the NPPF is clear in its recognition of the need for local planning authorities to require an Applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. It is also unequivocal on the matter of scope, as it mentions that the level of detail should be proportionate to the importance of the asset, and no more than sufficient to understand the potential impact of a development on that significance.
- The way in which heritage significance is expressed within this ES Chapter has been specifically developed, based on good practice, to ensure that it is fully aligned with the Planning (Listed Buildings and Conservation Area) Act 1990, the NPPF and "Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment".
- F<sub>3.13</sub> The statements of significance developed for each of the assets reflect the language of the Planning (Listed Buildings and Conservation Areas) Act 1990, utilising terms such as 'character and appearance' (of Conservation Areas; Section 72 of the Act), and 'architectural and historic interest' (of Listed Buildings; Section 66 of the Act). Further frames of reference, found within Conservation Principles, allow for terms such as 'evidential', 'historical', 'aesthetic' and 'communal' to be used to convey the many heritage values that combine to make up the heritage significance of an asset.
- F<sub>3.14</sub> The statements of significance describe 'what matters and why', i.e. which aspects of an asset and its setting contribute to the heritage significance of the asset and how. Although the statements rightly acknowledge the fabric of heritage assets as representing the principal embodiment and physical manifestation of their heritage significance, the surroundings of the assets, and the ways in which they can be experienced, often contribute to their overall significance. This will be assessed in line with the settings assessment methodology (ES Volume 2, Appendix F<sub>4</sub>).
- F3.15 Although terms such as High, Medium or Low value, and National, Regional or Local importance are often adopted in EIA to express a summary description of the 'relative significance' heritage assets, they are not universally recognised or accepted terms within heritage sector guidance and amongst heritage professionals. This is because these concepts require complex definitions to properly allow for their application, and do not directly relate to the language or key tests required in determining planning applications or heritage consents.
- F<sub>3.16</sub> The criteria adopted for this ES Chapter are laid out in Table F<sub>3.1</sub>, with terminology used derived directly from the NPPF. The language used in this ES Chapter is entirely consistent with the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990, and provides the decision-maker with sufficient information to understand how change could bring benefit or harm to the heritage significance of an asset(s), thus enabling an informed judgement to be reached.

Table F3.1 Criteria for assessing the significance of heritage assets

Heritage significance	Description of criteria
Designated heritage assets of the highest significance	As defined in the NPPF, these include: Scheduled Monuments, Protected Wreck Sites, Registered Battlefields, Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Gardens, and World Heritage Sites.
	Heritage assets displaying considerable evidential, historic, aesthetic or communal value, as identified by Conservation Principles, which are of comparable significance to designated heritage assets of the highest significance (including assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments), would also fall within this category.
Designated heritage assets of less than the highest significance	In accordance with the NPPF, these include, Grade II Listed Buildings and Grade II Registered Parks and Gardens. Although not mentioned specifically, Conservation Areas are considered to fall within this category as they are not listed as of highest significance.
Non-designated heritage assets	This includes archaeological remains, built heritage or historic landscape features which are not designated, but which display evidential, historic, aesthetic or communal values, as identified by Conservation Principles, and thus have a degree of significance meriting consideration in planning decisions on the basis of their heritage interest.
	The July 2019 revision of the Planning Practice Guidance defines non-designated heritage assets as those identified as such in publicly accessible lists or documents provided by the plan-making body. Where these sources do not specifically define assets as non-designated heritage assets, they will be referred to as heritage assets for the purpose of this ES. The assessment of non-designated heritage assets and heritage assets will be equivalent in this ES, in line with industry standards and guidance on assessing significance and impact. They may not, however, carry equivalent weight in planning as set out within the provisions of the NPPF.
	Non-designated heritage assets are assessed in relation to high / medium / low sensitivity
Uncertain	Heritage assets, the significance of which has not yet been ascertained.
Negligible	Structures that do not have sufficient significance to warrant consideration in planning decisions, and which are therefore not considered to constitute heritage assets.

#### **Assessment of Proposed Development Effects**

F3.17

The methodology presented here moves away from the more traditional 'scalar', quantitative, matrix-led approach, adopting a descriptive, qualitative presentation of the findings of the assessment. This is because the descriptions of anticipated Proposed Development impacts upon heritage assets are qualitative rather than quantitative and the adopted approach allows for greater accuracy in understanding the potential harm the Proposed Development may cause to the significance of heritage assets. As with the approach adopted in assessing heritage significance of heritage assets, this approach directly reflects key concepts in planning policy and heritage guidance with regard to the assessment of Proposed Development effects upon heritage assets. It therefore offers an appropriate way to define such effects. Clear statements of significance (the 'what matters and why' approach), and a sound understanding of the character of the Proposed Development, as presented in this assessment methodology, allow for a transparent articulation of the nature/degree of any identified impacts.

F3.18 The effects of the Proposed Development arise as a result of change (impact) to the heritage assets. The significance of a heritage asset can be harmed or lost through alteration, destruction or development within its setting. In terms of harm though changes to setting, as clearly illustrated within the NPPF, any attempt to convey the impact or harm of a development has to be framed within the tightly defined parameters of harm to the significance of the heritage asset itself. This is a fundamental principle. In summary, a project could bring about change within the setting of a heritage asset, resulting in harm to its significance, or the way in which that significance is experienced. References such as 'harm to setting' are therefore avoided.

The assessment of the effect of the Proposed Development upon cultural heritage resource takes into account numerous factors, including the scale of development, the type and extent of physical disturbance and the visual effects. Proposed Development impacts may be:

- Direct or indirect. Direct impacts arise from physical change to the resource, which affects its physical remains or fabric (i.e. excavations which may affect the archaeological remains or alterations to historic buildings). Indirect impacts relate to changes within the setting of heritage assets.
- Permanent or temporary. Due to their character, direct impacts upon the physical remains of heritage assets are permanent, and not reversible. However, impacts on the settings of heritage assets may be temporary, if the Proposed Development has a limited lifespan. These temporary effects can be short, medium or long-term.
- Beneficial, when the Proposed Development leads to the enhancement of the heritage
  resource, or adverse, when it results in harm to, or loss of, the significance of a heritage
  asset. If the resource will not be affected by the Proposed Development, there will be no
  impact.

To further assist in the decision-making process, the following approach to the assessment of effects upon heritage assets (Table F3.2) is adopted. This has been done in order to improve the intelligibility of the assessment results for purposes of quick reference and ready comprehension. The language used here is entirely consistent with the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990, and provides sufficient information to reach informed judgement.

Table F3.2 Levels of effects upon heritage assets

Level of effect	Description	Applicable policies
Heritage benefit	The proposals would enhance the heritage significance of a heritage asset.	Enhancing the significance of a heritage asset is a desirable Application Scheme outcome in respect of heritage. It is consistent with key policy and guidance, including the NPPF paragraphs 197 and 206.
No harm	The proposals would preserve the significance of a heritage asset.	Preserving a Listed Building and its setting is consistent with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.  Preserving or enhancing the character or appearance of a Conservation Area is consistent with Section 72 of the Act.  Sustaining the significance of a heritage asset is consistent with paragraph 190 of the NPPF, and should be at the core of any material local planning policies in respect of heritage.
Harm to non- designated assets	The proposals would affect the heritage significance of a non-designated heritage	The key applicable policy is paragraph 203 of the NPPF which states that the in determining planning application, the effects of the Application Scheme on

F3.20

F3.19

Level of effect	Description	Applicable policies
	assets	the significance of non-designated heritage assets needs to be taken into account. A balanced judgement is required to weigh direct or indirect impacts on non-designated assets, having regard for the scale of harm and the significance of the asset.
Less than substantial harm to designated heritage assets	The proposals would be anticipated to result in a restricted level of harm to the significance of a designated heritage asset, such that the asset's contributing heritage values would be largely preserved (lower end).  The proposals would lead to a notable level of harm to the significance of a designated heritage asset. A reduced, but appreciable, degree of its heritage significance would remain (upper end).	This level of harm is defined within the NPPF specifically with regard to designated heritage assets. In determining an application, this level of harm should be weighed against the public benefits of the proposals, as per paragraph 202 of the NPPF. Proposals involving change to a Listed Building or its setting, or any features of special architectural or historic interest which it possesses, or change to the character or appearance of Conservation Areas, must also be considered within the context of the Planning (Listed Buildings and Conservation Areas) Act 1990. The provisions of the Act do not apply to the setting of Conservation Areas.
Substantial harm to designated heritage assets	The proposals would very much reduce the designated heritage asset's significance or vitiate that significance altogether	This level of harm is defined specifically with regard to the NPPF.  Paragraphs 200 and 201 of the NPPF would apply and state that substantial harm or loss to designated heritage assets of the highest significance should be wholly exceptional and to assets of less than highest significance – exceptional. Proposed development leading to such harm should be refused unless it is demonstrated that this substantial harm is necessary to achieve substantial public benefits.  The Planning (Listed Buildings and Conservation Areas) Act 1990 may also apply.

In this approach to EIA assessment, terms such as 'magnitude of effect', are not utilised. Instead, the extent of the effects identified is defined through appropriate description of the anticipated degree/extent of harm upon any sensitive heritage receptors. Such descriptions will define whether the effects will affect the assets or their settings and assess, if assets are affected directly, whether the assets are to be wholly or partly removed. Professional judgement is then used to ascertain the significance of effect on the sensitive heritage assets, taking into account the heritage significance of the assets as well as the identified effects and their extent.

The approach to the assessment of the significance of effect with regard to archaeological and heritage assets is defined as follows:

- In line with EIA best practice, it is considered that 'substantial harm' to a designated heritage asset would equate to a Major Adverse (significant) Effect in line with the language used within the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 'Less than substantial harm' to designated heritage assets could also trigger the same significant effect, resulting in Moderate Adverse (significant) Effect, but no prescriptive criteria are proposed to prejudge this threshold, leaving it to professional judgement as this

F3.21

F3.22

- will be dependent on the extent of harm and its effect on the significance of the asset. Where effects on the heritage assets are limited, this harm would result in Minor Adverse Effect (not significant).
- With regard to the harm to non-designated assets, professional judgment will be used to ascertain whether the significant effect (i.e. Moderate or Major Adverse (significant) Effect) is triggered, taking into account the relative significance of such assets as well as the level of harm upon them.
- No harm to designated or non-designated heritage assets would result in not significant effect (Negligible Effect).
- F<sub>3.23</sub> Where heritage benefits are identified (to designated or non-designated heritage assets), professional judgement will be used to ascertain the significance of the effect.

### Mitigation measures and Residual Effects

When impacts upon the cultural heritage resource have been identified, mitigation measures are proposed, where possible, in order to prevent, reduce or offset any significant effects. Mitigation measures, including embedded and further mitigation, are discussed below. It may also be possible to enhance heritage assets as part of the Proposed Development. In such circumstances, the weight given to the heritage values of the asset should be proportionate to the significance of the asset and the Proposed Development effect upon it. In order to assess residual effects following the implementation of the mitigation measures upon the significance of heritage assets, professional judgement is used.

#### Consultation

- F<sub>3.25</sub> Discussions with James Kenny, archaeological advisor to Arun District Council, were carried out in October 2020, in order to clarify the requirement for and scope of further archaeological works within the Development Site. Mr Kenny indicated that the proposed mitigation measures set out in this ES are acceptable.
- A Scoping Opinion was issued by Arun District Council on 15 October 2020 (ref. BEE/99/20/EIS), which confirmed that an assessment of archaeology and cultural heritage should be included within the ES. In relation to archaeology, James Kenny, the archaeological advisor to Arun District Council, reiterated comments made in a previous Scoping Opinion in June 2017 (ref. BE/65/17/EIS) which stated that areas not previously evaluated should be investigated prior to development.
- F<sub>3.27</sub> With regard to built heritage, the Scoping Opinion states that the Arun District Council Historic Building Officer has confirmed that the ES should include an assessment of the potential impacts on designated heritage assets as a result of alteration to their settings.

## **Assumptions and Limitations**

F<sub>3.28</sub> This assessment work is based in part upon a desk-based study and utilised secondary information derived from a variety of sources, only some of which have been directly examined for the purpose of this assessment. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate. The records held by the HERs and Historic England are not a record of all surviving heritage assets, but a record of the discovery of a wide range of archaeological and historical components of the historic environment. The information held within it is not complete and does not preclude the subsequent discovery of further elements of the historic environment that are, at present, unknown

- F<sub>3.29</sub> Due to subsequent changes to the redline boundary, an area within the north-west of the Development Site was not included within the 2009 evaluation. The level of information provided by the evaluation is nevertheless considered sufficient to inform the ES chapter, as agreed with the archaeological advisor to Arun District Council, as it provides a thorough understanding of the likely archaeological potential within the small unevaluated part of the Development Site.
- F<sub>3.30</sub> It is assumed that all mitigation is as referred to on a parameter plans (and not illustrative masterplan) including planting.

## **Baseline Conditions**

### **Existing Conditions**

- This section of the ES Chapter presents a summary of the historical and archaeological background of the Development Site, based on the desk-based assessment, trial trench evaluation, archaeological sensitivity note, and settings assessment (ES Volume 2, Appendices F1-F4).
- F4.2 The date ranges of archaeological periods referred to within this text are provided in Table F4.1.

Table	F4.1	Period	date	ranges

Period	Date range
Palaeolithic	500,000 BC - 10,000 BC
Mesolithic	10,000 BC - 4000BC
Neolithic	4000 BC - 2400 BC
Bronze Age	2400 BC - 700 BC
Iron Age	700 BC – AD 43
Roman	AD 43 – AD 410
Early medieval	AD 410 – AD 1066
Medieval	AD 1066 – 1539
Post-medieval	AD 1539 - 1800
Modern	1801 - present

#### **Prehistoric**

- The evaluation identified a palaeo lake within the north of the Development Site (Volume 2 to this ES, Figure F1: 9), which contained deposits of probable Late Pleistocene date (c. 129,000 12,000 years ago). Charcoal recovered within these deposits was considered to be potentially indicative of hominin activity. A residual find of a fragment of Lower or Middle Palaeolithic handaxe was also recovered during the evaluation, approximately 200m to the south-west of the palaeo lake (Volume 2 to this ES, Figure F1: 10).
- F4.4 Finds of Mesolithic flint have been recorded within the surroundings of the Development Site, including immediately to the east (Appendix F1, Figure 2: 11). No finds of this period were recorded within the Development Site by the evaluation, although the aforementioned palaeo lake was thought to contain a Holocene layer overlying the Pleistocene deposits.
- F4.5 A ditch containing Early Neolithic pottery and a large quantity of worked flint was identified within the north-east of the Development Site by the evaluation (Volume 2 to this ES, Figure F1: 3). The debitage material within the flint assemblage suggested that the flint had been worked in situ. It is possible that some of the undated features recorded by the evaluation may also date to this period.
- The existence of Bronze Age activity is well-attested within the local area, and the evaluation identified a number of features of this period within the Development Site. These included Middle Bronze Age pottery which was recovered from a single ditch within the south of the Development Site (Volume 2 to this ES, Figure F1: 19). Features of Late Bronze Age date were recorded within several discrete areas within the north and north-east of the Development Site (Volume 2 to this ES, Figure F1: 1, 2, 4, 6) and comprised ditches, some of which contained pottery which was thought to represent structured deposits; possible burnt mound debris; and a

pit (Volume 2 to this ES, Figure F1: 11). An undated pit or posthole located beneath one of the identified Late Bronze Age ditches also dates to this period or earlier.

- F4.7 An undated ring ditch identified by the evaluation within the south of the Development Site was thought to potentially represent a Bronze Age round barrow, (Volume 2 to this ES, Figure F1, 18), although a pit within the interior appeared to be of Roman date. A further ring ditch was recorded on high ground in the central part of the Development Site (Volume 2 to this ES, Figure F1: 8), but was found to contain both Late Bronze Age/Early Iron Age pottery as well as later material, with the homogenous nature of the fill making it difficult to determine whether the finds derived from later infilling.
- F4.8 Iron Age remains recorded by the evaluation included a ditch within the north-west of the Development Site (Volume 2 to this ES, Figure F1: 5), which contained Middle to Late Iron Age pottery and burnt flint. A feature to the south-east of this (Volume 2 to this ES, Figure F1: 7), comprising a possible pit or ditch terminus, contained Iron Age pottery, along with flint debitage and burnt material which may represent structured deposits and/or nearby occupation debris.
- F4.9 A further concentration of possible Iron Age occupation was identified within the east of the Development Site (Volume 2 to this ES, Figure F1: 12), represented by a small group of features including a ditch, a pit and a possible holloway from which Middle Iron Age pottery was recovered. Within the south of the Development Site, the evaluation identified a number of ditches which were thought to comprise Iron Age field boundaries (Volume 2 to this ES, Figure F1: 16), with substantial quantities of pottery within one of the features indicating the likely presence of nearby settlement. Further ditches of Iron Age date, containing fewer pottery sherds and likely representing field boundaries, were recorded in the north-west and south-west of the Development Site (Volume 2 to this ES, Figure F1: H, M).
- F4.10 The evaluation identified a number of features which could not be more closely dated than to the later prehistoric period. Amongst these were a pit within the west of the Development Site (Volume 2 to this ES, Figure F1: 10) which contained a number of unworked burnt flints along with an assemblage of late prehistoric pottery.

#### Roman

- Previous investigations within the surroundings of the Development Site have identified considerable evidence for Roman period activity, including the presence of a probable farmstead at Newland Nursery, to the north-west (Appendix F1, Figure 2: 6).
- Within the Development Site, a surface spread of Roman material, comprising burnt flint, oyster shells and pottery, was recorded on an area of higher ground at the south-eastern edge in 1974 (Appendix F1, Figure 2: 17) and was suggested to represent in situ occupation debris. The evaluation identified a number of Roman period features near this approximate area, including ditches, pits and a possible hearth or kiln containing 1st to 2nd century Roman pottery (Volume 2 to this ES, Figure F1: 13, 14). A pit containing a large assemblage of 2nd to 4th century pottery was interpreted as a possible waterhole (Volume 2 to this ES, Figure F1: 15). Ditches representing field boundaries extended to the south and east of this concentration of features.
- F4.13 A further focus of Roman period occupation-related remains was identified by the evaluation in the north-west of the Development Site (Volume 2 to this ES, Figure F1: 8), also on a topographical high point. Here, the recorded features included pits containing dark fills and substantial quantities of Roman pottery, ditches, and a hearth pit. Based on the pottery finds, occupation in this area appears to have spanned the early to late Roman period.

#### Medieval and later

- The settlement of North Bersted, *c*. 650m to the east of the Development Site, originated in the 7<sup>th</sup> century when it formed part of the estate of Pagham, which was granted by Caedwalla, King of Wessex, to Wilfrid. The estate was subsequently conveyed to the See of Canterbury, under whose ownership it remained until 1542. The settlement was characteristic of a rural village up until the 20th century, when it became subsumed along with South Bersted, c. 1.8km to the east of the Development Site, in the modern outskirts of Bognor Regis.
- The evaluation identified a small number of features of medieval and post-medieval date within the Development Site. All of these appeared to be agricultural in origin and consisted of ditches, animal burials and furrows. A limited quantity of medieval pottery was recovered from a single ditch in the area of the palaeo lake in the north-east of the Development Site, with all remaining medieval and later pottery finds located within the subsoil.
- Park Farm, in the north-western part of the Development Site, is first depicted on the 1779 map of Sussex. The Archaeological Desk-Based Assessment (Appendix F1) included an assessment of the extant buildings within the farm, and four 19th century buildings have been identified (Appendix F1, Figure 3). Of these, it appears that two structures shown on the 1840 map and one building shown on the 1880 map are extant, although have been altered in the 20th century.
- During the Second World War the southern part of the Development Site was in use as an Advanced Landing Ground airfield constructed in 1943 as part of Operation Hadrian. The airfield was designed and built as a temporary structure and included two runways; dispersal areas; hardcore working/parking areas; hangars; accommodation and technical buildings; and air raid trenches. Morells Farm, to the west, is thought to have used as an Officer's Mess, with a number of the barns serving as storage and the telephone exchange for the airfield (Ref. 9). The airfield closed in September 1944 and the Development Site was returned to agricultural use.
- The evaluation recorded several features which were thought to be associated with the former airfield, including a slit trench, probably intended as an air raid shelter, as well as areas of hard standing which were identified as gravel or rubble layers laid into the subsoil. Metal detecting undertaken as part of the evaluation also recovered an assemblage of metal items relating to the airfield, including bullets, bomb or shell fragments and a selection of aluminium fragments.

#### **Undated**

A number of undated features were recorded within the Development Site by the evaluation, in addition to the two ring ditches of unconfirmed date (discussed in the prehistoric section above). The majority of these features comprised ditches which were assumed to represent field boundaries associated with identified areas of prehistoric or Roman activity. A possible cremation pit, identified within a trench in the south of the Development Site (Appendix F5, Volume 2 to this ES, Figure F1: 17) as circular feature of 0.4m in diameter and containing charcoal and burnt bone, was preserved in-situ. On account of its proximity and similar size, a second pit located close to this was also preserved in-situ, although no burnt bone was observed on its surface. An undated hearth pit was identified within the south-east of the Development Site (Appendix F5, Volume 2 to this ES, Figure F1: P).

#### The settings of heritage assets

F4.20 Step 1 of the settings assessment (ES Volume 2, Appendix F4) utilised readily available information to establish whether the significance of heritage assets within the surrounding of the Development Site may be affected by changes to their settings resulting from the Proposed Development. A number of designated heritage assets, all comprising Grade II Listed Buildings,

were considered for assessment (Appendix F5, Volume 2 to this ES, Figure F2), however it was established during the site visit that due to a combination of distance, topography and intervening vegetation, the development would not have the potential to change the assets settings, or affect the significance of the majority of these assets. These were therefore scoped out from further assessment.

F4.21 Subsequently, it was identified by Step 1 that designated heritage assets which may potentially be sensitive to the development, due to possible changes to the settings, comprise:

- Morells Farmhouse, Grade II Listed Building located c. 20m to the west of the Development Site (Appendix F5, Volume 2 to this ES, Figure F2: A);
- Lagnersh Farmhouse, Grade II Listed Building located c. 520m to the west of the Development Site (Appendix F5, Volume 2 to this ES, Figure F2: B); and
- Neal Farmhouse, Grade II Listed Building located c. 550m to the west of the Development Site (Appendix F5, Volume 2 to this ES, Figure F2: C).
- These were identified using a combination of GIS analysis and field examination, which has considered, amongst other factors, the surrounding topographic and environmental conditions, built form, vegetation cover, and lines of sight, within the context of the assets' heritage significance.

#### Significance of sensitive receptors

F4.23 The following section discusses the heritage significance of potential sensitive receptors at the Development Site. This is also summarised in Table F4.2, below.

#### **Archaeological remains**

F4.24 The significance and sensitivity of identified archaeological remains has been summarised within the archaeological sensitivity note (Appendix F3). This categorised the identified archaeological remains within the Development Site into discrete zones of sensitivity, which have formed the basis of the following characterisation.

#### Pleistocene deposits

The palaeo lake identified within the north of the Development Site contained probable Pleistocene deposits which were potentially associated with hominin activity, while a Palaeolithic handaxe was also recorded in the vicinity. On account of their evidential value, relating to their potential to contain rare in situ evidence of Palaeolithic activity, the Pleistocene deposits are considered to be non-designated heritage assets of high sensitivity.

#### **Early Neolithic remains**

A ditch containing Early Neolithic date is recorded within the north-east of the Development Site, and indicates the potential for further remains of this period to be present. Such remains retain evidential value due to their potential to provide information relating to settlement, land organisation and agricultural practices in this period. Early Neolithic remains likely represent non-designated heritage assets of high sensitivity.

#### **Bronze Age remains**

F4.27 Middle and Late Bronze Age activity, represented by ditches, a possible burnt mound deposit, and pits has been identified within several areas of the Development Site. Owing to their evidential value, associated with their potential to inform understandings of Bronze Age

Pg 16

lifestyles, society and agricultural practices, remains of this period are considered to be nondesignated heritage assets of high sensitivity.

#### **Iron Age remains**

- F4.28 The evaluation identified four main areas of Iron Age activity which were thought to be associated with nearby settlement. These remains may therefore retain evidential value associated with their potential to yield information on Iron Age society, and have been classified as non-designated heritage assets of high sensitivity.
- F4.29 Iron Age features which were not identified as being directly associated with settlement, including isolated ditches, probably representing field boundaries, in the south-west and north-west of the Development Site, are likely to be of lesser significance and have accordingly been characterised as of medium sensitivity.

#### Late prehistoric remains

Features of unspecified late prehistoric date retain evidential value, but their ability to inform on specific aspects and periods of prehistoric activity is more limited. On the basis of current information, such features have been identified as non-designated heritage assets of medium sensitivity.

#### **Roman remains**

- F4.31 Roman period features associated with settlement activity were primarily focused on two separate areas of high ground within the north-west and south-east of the Development Site, and included hearths and pits containing pottery. Due to their potential to inform on the distribution and nature of rural settlement in the Roman period, these features are considered to be non-designated heritage assets of high sensitivity.
- F<sub>4.32</sub> Remains of field boundaries radiating south of the main areas of Roman activity are of lesser value, but nevertheless represent part of the landscape of this period. Such features are considered to be of low or medium sensitivity, depending on their proximity to settlement.

#### Medieval and post-medieval remains

F4.33 All of the identified remains of medieval and post-medieval date were agricultural origin and did not appear to be associated with any settlement or other forms of occupation. Although these may retain a limited degree of evidential value as remnants of former land-use, they are on the whole well-understood features which are of negligible heritage significance.

#### **Modern remains**

- The evaluation identified a probable slit trench which was thought to be associated with the former Second World War airfield within the south of the Development Site. This feature is of evidential value, stemming from its ability to clarify the layout and use of the airfield, and has been classified as being of medium sensitivity.
- F4.35 Features associated with modern agricultural activity, such as removed field boundaries or former drainage systems, are considered to be of negligible heritage significance

#### **Undated remains**

F4.36 A number of features of unknown or uncertain date were identified within the Development Site by the evaluation. Although a degree of uncertainty may remain with regard to the precise date

and function of these features, a tentative assessment of their significance has been made based on their form and wider context.

- An undated ring ditch was identified within the south of the Development Site which, based on its morphology and location on an area of higher ground, was suggested to represent a Bronze Age round barrow, or possibly an Iron Age roundhouse. While a feature within the internal area of the ditch was dated to the Roman period, the ring ditch has been identified as being of high sensitivity on the basis of its potential association with prehistoric funerary practices or settlement.
- F4.38 A second ring ditch was recorded within the central part of the Development Site, near an area of identified Roman activity. This feature may also represent a Bronze Age round barrow or an Iron Age enclosure, although its fill produced finds of varying dates. This has again been classified as being of potential high sensitivity.
- F4.39 Due to their potential association with funerary activity, the two possible cremation pits within the south of the Development Site are classified as being of high sensitivity.
- F4.40 The undated hearth pit within the south-east of the Development Site is identified as being of medium sensitivity, while undated ditches are considered to be of low sensitivity.
- There is a potential that further archaeological remains are present across the Development Site, including within an area in the north-west which was not included within the 2009 evaluation, The significance of these remains is currently unknown, although it is noted that a number of reservoirs are present within the north-west, indicating that any archaeological remains may have been previously impacted.

### **Extant buildings on Development Site**

F4.42 Three buildings of 19th century date are present at Park Farm, although they have been altered in the course of the 20th century. Such features are considered to be of local interest (low sensitivity). No other extant buildings within the Development Site are of heritage interest (negligible heritage sensitivity).

#### Designated heritage assets

- The Grade II Listed Morells Farmhouse is believed to be of predominantly 18th century, although the inscription '1616' appears on a datestone above the front door. The building is of two storeys in height and constructed on a rectangular plan, with red-brick, stringcourse elevations to the rear, flint faced end walls and a stuccoed front. The building draws its significance primarily from the evidential and historical values embedded within its physical fabric as an example of 18th century vernacular architectural styles and a surviving element of the local post-medieval landscape. This significance is enhanced by aspects of its setting, including its associated farm complex and garden, its roadside location, and associated agricultural land. As a Grade II Listed Building, Morells Farmhouse is a designated heritage asset of less than the highest significance.
- F4.44 The Grade II Listed Lagnersh Farmhouse is a substantial 18th century farmhouse. It is of two storeys in height and three bays wide, with stuccoed elevations and a tile covered roof. The glazing bars on the windows are intact. A modern glazed porch with the inscription '1740' is present on the front of the building. The buildings principal source of significance is the evidential and historical values held within its physical fabric. Elements of setting which can also be considered to contribute to the building's significance include its associated garden plot, its position along Lower Bognor Road, and surrounding agricultural land. By virtue of its

F4.45

designation, Lagnersh Farmhouse is a designated heritage asset of less than the highest significance.

The Grade II Listed Neal's Farmhouse comprises a 16th century timber-framed house, of two storeys in height and constructed on an L-shaped plan. The building has a thatch-covered roof and its exterior is mostly faced with stucco, although a section of exposed timber with brick infill is present on the west wall. The building derives from the evidential value of its physical form and fabric, as well as from its historical illustrative value, linked to the early post-medieval development of the local landscape. The building has a strongly defined immediate setting, formed by an enclosed garden plot with an associated farmyard to the north. Agricultural land surrounding the farmhouse makes a minor contribution towards the building's significance. On account of its status as a Grade II Listed Building, Neal's Farmhouse represents a designated heritage asset of less than the highest significance.

Table F4.2 The significance of sensitive receptors

Heritage significance	Receptors
Designated heritage assets of the highest significance	None
Designated heritage assets	Grade II Listed Morells Farmhouse (Figure F2: A see note)
of less than the highest	Grade II Listed Lagnersh Farmhouse (Figure F2: B see note)
significance	Grade II Listed Neal's Farmhouse (Figure F2: C see note)
Non-designated heritage	High sensitivity
assets	Pleistocene deposits (Figure F1: 9, 10 see note)
	Archaeological remains associated with Early Neolithic activity (Figure F1: 3 see note)
	Archaeological remains associated with Bronze Age activity (Figure F1: 1, 2, 4, 6, 11, 19 see note)
	Features associated with Iron Age occupation (Figure F1: 5, 7, 12, 16 see note)
	Features associated with Roman settlement activity (Figure F1: 8, 13, 14, 15 see note)
	Undated ring ditches (Figure F1: 18 see note)
	Possible cremation pits (Figure F1: 17 see note)
	Medium sensitivity
	Iron Age and Roman ditches not directly associated with settlement (Figure F1: H, M see note)
	Late prehistoric features (not attributable to specific prehistoric period)
	Slit trench associated with WWII airfield (Figure F1: M see note)
	Undated hearth pit (Figure F1: P see note)
	Low sensitivity
	Roman field boundaries and isolated ditches located outside settlement
	areas
	Undated ditches
Uncertain	Currently unknown archaeological remains
Negligible	Agricultural features of medieval to modern date

Note: All Figures are provided at Volume 2 to this ES

#### **Future Baseline**

- F4.46 In the event that the Proposed Development does not proceed, the continued use of the Development Site for arable farming may lead to the progressive truncation and loss of any subsurface archaeological remains through regular ploughing.
- F4.47 As the Development Site is allocated within the local plan, it is likely that it will be developed for residential uses in the future should the current proposals not progress. Such development would potentially result in the partial or total loss of known and potential archaeological remains.
- F4.48 No immediate changes to the setting of designated heritage assets are predicted should the Proposed Development not proceed. Any future development as resulting from the Development Site's allocation within the local plan could potentially lead to harm to surrounding designated heritage assets.

## **Potential Effects**

### **Built-in Mitigation**

- F<sub>5.1</sub> Where feasible, the scheme design has been carefully considered so as to minimise the potential impacts of the Proposed Development upon heritage assets. A number of archaeological remains identified as being of high sensitivity will be incorporated within areas of planned open-space, thereby enabling their preservation in-situ.
- The provision of open space at the south-western edge of the Development Site would serve to maintain a degree of separation between the Proposed Development and the Grade II Listed Morell's Farmhouse. Proposed woodland and parkland planting immediately south and east of the farmstead would also assist in screening the Proposed Development within views from the rear and side of the Listed Building, and when experiencing the asset from Lower Bognor Road. These design measures seek to lessen the potential effects upon this designed heritage asset that would arise as a result change to its setting.

### **During Construction**

#### Archaeological remains

- The potential effects of the Proposed Development upon the buried archaeological resource would primarily occur in association with the construction groundworks, which have the potential to physically impact upon any underlying archaeological remains. Construction operations within a greenfield site typically entail piecemeal, but extensive, below-ground disturbance. The extent of this disturbance is contingent on the nature of the construction techniques used and would therefore vary across the Development Site according to the proposed use of the area. However, it can be expected that on-site activities with the potential to harm archaeological remains would include the excavation of building foundations and trenches for the installation of drainage and services and stripping and landscaping for the construction of new roads, car parks and pavemented areas.
- The impacts upon the archaeological resource as a result of these construction activities would be direct, adverse, permanent and irreversible and would be likely to result in complete or partial loss of any potential buried archaeological features or deposits. Such impacts would apply to several features identified as being of high sensitivity, including areas of Neolithic, Bronze Age, Iron Age and Roman activity, as well as the majority of remains of medium and low sensitivity. Prior to the implementation of appropriate mitigation, as outlined below, the resultant harm to these archaeological remains would likely be substantial, leading to **Major Adverse** (significant) Effects.
- For archaeological remains located outside the main development areas, i.e. within planned open space, it is anticipated that some degree of below-ground disturbance could occur in association with any landscaping and the insertion of green infrastructure such as tree plantings. Additionally, such areas could potentially be subject to an element of disturbance associated with temporary construction facilities and compounds. Identified archaeological remains within planned open space areas include the Palaeo lake containing Pleistocene deposits, and features relating to Bronze Age, Iron Age, Roman and WWII activity. Subject to the construction methods used, it is expected that any harm resulting from potential construction activities in these areas would be less than substantial and would likely equate to a **Minor Adverse** (not significant) effect.

- F<sub>5.6</sub> A number of areas of identified archaeological remains, including a late Bronze Age ditch and Iron Age features, are positioned on the interface between areas of development and open space. The impact on these features would potentially vary, with a **Major Adverse** effect occurring within the footprint of houses and roads, and non-significant effects ensuing within the open space areas.
- F<sub>5.7</sub> Specific impacts upon individual areas of identified archaeological remains are described in Table F<sub>8.1</sub>.

#### Extant buildings on Development Site

- F<sub>5.8</sub> The potential effects of the Proposed Development upon the 19th century buildings on Development Site would occur during the demolition.
- The impacts upon the buildings as a result of these activities would be direct, adverse, permanent and irreversible and would result in complete loss of heritage significance of these assets of low sensitivity. Prior to the implementation of appropriate mitigation, as outlined below, the resultant harm to these structures would be substantial, leading to **Moderate**Adverse (significant) Effects.

#### Designated heritage assets

During construction, impacts upon surrounding designated heritage assets would derive from the presence of machinery, security fencing or hoardings and compounds, with other experiential impacts associated with noise and traffic within the Development Site. Construction operations of this nature would be temporary, and the resulting impacts would be relatively limited and short-lived when compared with the completed development, and therefore unlikely to be significant. As such, discussion of impacts upon designated heritage assets will refer to the operational phase of the Proposed Development.

## **During Operation**

#### Archaeological remains

F<sub>5.11</sub> Impacts upon the archaeological resource would be confined to the construction phase of the development, during which the excavations that have the potential to affect buried remains would occur. Accordingly, there would be no adverse effects upon the archaeological resource during the operational phase.

#### **Extant buildings on Development Site**

F<sub>5.12</sub> Impacts upon the buildings would be confined to the construction phase of the development, during which the demolition would occur. Accordingly, there would be no adverse effects upon the resource during the operational phase.

#### Designated heritage assets

F<sub>5.13</sub> As described above, the potential effect upon designated heritage assets within the wider landscape surroundings of the Development Site have been considered under the operational phase of the development, as it is during this phase that the extent of the potential alterations to the settings of these assets would be at its greatest. These are summarised in Table F8.1, below.

#### **Grade II Listed Morrells Farmhouse**

- F<sub>5.14</sub> The Settings Assessment (Appendix F<sub>4</sub>) determined that the Proposed Development would not alter any of the principal contributors to the significance of the Grade II Listed Morrells Farmhouse, inherent within its physical fabric. Key aspects of the building's setting, including its relationship with the associated garden and farm complex and westward views attained from the principal elevation, would also remain unchanged.
- Nevertheless, the completed development would negatively impact upon the significance of the asset through altering additional elements of its setting from which it draws significance. In particular, the introduction of housing within the surrounding landscape to the south and east of the building, identified by the Settings Assessment to contribute to the asset's significance by way of maintaining its historically agricultural context, would change the character of this presently rural setting, and alter the key experience of the asset from Lower Bognor Road. However, the proposed woodland and parkland planting immediately south and east of the farmstead would serve as visual and landscape buffer, helping to preserve the more immediate and contributory elements of setting of the asset. The buffer would also be of benefit in further limiting the visibility of the Proposed Development within views from the Listed Building, which are present constrained by the existing tree line to the rear and side of the farmstead.
- Owing to the above landscaping measures, as well as the siting of buildings of lower height within the areas closest to the building, the level of harm incurred to the Grade II Morrells Farmhouse would be less than substantial, translating to a **Minor Adverse** (not significant) effect.

#### **Grade II Listed Lagnersh Farmhouse**

- F<sub>5.17</sub> As identified by the Settings Assessment (Appendix 4F), the Proposed Development would not affect the key contributors to the significance of the Grade II Lagnersh Farmhouse, including crucial aspects of its setting formed by its immediate and historically associated surrounds.
- Following completion, the Proposed Development would result in alteration to part of the wider rural setting of the Listed Building. However, on account of distance and intervening vegetation, views from the building would remain largely unchanged as would the current ability to appreciate the asset as a rural farmhouse.
- F<sub>5.19</sub> The Proposed Development would therefore result in No harm to the Grade II Lagnersh Farmhouse, equating to a **Negligible** effect.

#### **Grade II Listed Neal's Farmhouse**

The Development Site has no known visual, historical or functional association with the Grade II Listed Neal Farmhouse, and the elements of setting which inform the significance of the asset would be in no way affected by the Proposed Development. The Proposed Development would represent a change of character to the wider rural setting of the Grade II Listed Neal Farmhouse, and would potentially occasion a small, if discernible, change to views from the upper storeys of the farmhouse's north-east elevation. However, the overall degree of change would be minimal and would not result in any harm to the significance of the asset, thereby producing a **Negligible** effect.

## **F6.0** Mitigation and Monitoring

### **During Construction**

- In order to ameliorate the effects of construction activities upon archaeological remains within the Development Site, an appropriate programme of archaeological mitigation will be carried out prior to and during construction. In accordance with Paragraph 205 of the NPPF, the recommended form and scope of the mitigation varies across the Development Site according to the identified sensitivity of known areas of archaeology and the likely construction impacts associated with the proposed land-use.
- The 2009 evaluation within the Development Site (Appendix F2) has enabled the development proposals to be tailored to allow preservation in-situ of several areas of identified archaeological remains of high and medium sensitivity, through their inclusion within public open space as part of the implemented detailed design in accordance with the submitted parameter plans. This includes the Palaeo lake as well as remains associated with Bronze Age, Iron Age, Roman and WWII activity. While no significant effects are anticipated in relation to these remains, it is recommended that a method statement for groundworks within these areas is agreed through consultation with the archaeological advisor, in order to ensure that these assets are appropriately safeguarded.
- F6.3 For remains of high and medium sensitivity which are not included within areas of proposed open space, comprising features associated with Neolithic, Bronze Age, Iron Age and Roman activity, a targeted programme of 'strip, map and record' excavation would be carried out to enable preservation by record. This approach would serve to partially offset the loss of these assets through knowledge gained in the course of the excavations. This would be secured as a condition to any planning consent granted.
- Fo.4 For areas of low sensitivity, it is considered that the effects of construction activities upon archaeological remains could be suitably managed through archaeological monitoring during the construction ground works, to enable the identification and recording of any archaeological remains present ('archaeological watching brief'). Should any remains of higher significance be identification during the course of the groundworks, further investigation and recording may be required. This would be secured as a condition to any planning consent granted.
- For the area within the north-west of the Development Site, which was not included within the previous evaluation, further evaluation should be carried out in order to clarify the presence/absence, extent and significance of any archaeological remains. This would establish the need for, and scope of, any further mitigation in this part of the Development Site. Given the likely previous impacts associated with the construction of reservoirs in this area, it is appropriate that the evaluation be carried out at the post-determination stage, as a condition of planning consent.
- The above mitigation strategy has been agreed in principle through consultation with James Kenny, the archaeological advisor to Arun District Council. Mr Kenny stated that this approach could be secured via an overarching planning condition which requires the preparation and approval of a Written Scheme of Investigation (WSI) to cover the whole Development Site (which could be implemented in phases, and can be determined at Reserved Matters Stage), including commitments to preservation in-situ or through investigation, community engagement, archive deposition and publication. The WSI would specify the need for individual WSI's for the investigation of different parts of the Development Site.

F6.7 For the extant buildings within the Development Site which are of low sensitivity, it is considered that the effects of demolition could be suitably managed through historic building recording to appropriate level prior to demolition taking place. This would be secured as a condition to any planning consent granted.

## **During Operation**

Mitigation to reduce the non-physical effects upon the settings of designated heritage assets has been embedded in the design of the Proposed Development and includes the creation of a buffer zone of green space and planting adjacent to the Grade II Listed Morrells Farmhouse. These measures ensure that no significant effects will occur, and no further mitigation measures are therefore necessary.

## F7.0 Residual Effects

### **During Construction**

- F7.1 Following the implementation of the proposed mitigation measures, the significance of effect upon buried archaeological remains within the areas proposed for construction activity and the extant 19th century buildings within the Development Site will be substantially reduced. It is considered that the benefit of enhancing the understanding of the archaeological and built heritage resource through the processes of recording, analysis and publication, will, to a large extent, off-set any adverse impacts on the archaeological resource, thus ensuring that the residual level of harm would be less than substantial. This residual harm would **not be a significant effect** in EIA terms.
- F<sub>7.2</sub> The residual effects upon individual areas of archaeological remains are described in Table F8.1.

### **During Operation**

F<sub>7.3</sub> The mitigation measures built into the design of the Proposed Development effectively minimise the level of non-physical (visual) effects upon the historic resource. As no additional mitigation is therefore proposed, the non-significant effects would remain unchanged.

F8.2

F8.3

## F8.0 Summary & Conclusions

This Chapter of the ES has considered the likely significant effects of the Proposed Development on the archaeological and cultural heritage resource.

Archaeological investigation within the Development Site has revealed a range of archaeological remains, representing Palaeolithic, later prehistoric and Roman activity, as well as features relating to the Development Site's use as a WWII airfield. Construction activities associated with the Proposed Development could permanently damage, or remove, any below-ground archaeological remains present within the footprint of the construction works, although several areas archaeological remains would be preserved in-situ within areas of open space, thereby avoiding any significant effects. The extant 19th century buildings are proposed for demolition. For those remains and buildings likely to be subject to harm, this would be addressed via an appropriate strategy of archaeological mitigation (to be agreed through consultation with the archaeological advisor to Arun District Council and likely secured as a condition to planning consent) to enable their preservation by record and compensate for the loss of this resource through the knowledge gained. Following the implementation of the mitigation, the resultant effects of the archaeological resource and historic buildings would be not significant and the provisions of the local, regional and national planning policies would be met.

The Proposed Development would alter the wider rural setting of the Grade II Listed Morrells Farmhouse. However, the principal elements of the asset's significance, derived from its surviving historic fabric and form and more immediate setting, would be preserved. Design mitigation measures have been built into the Proposed Development to reduce these impacts. These include the retention of the area of immediately west of the farmstead as a buffer zone, with planting to minimise any visual effects. Owing to these measures, the impact upon the asset would fall within the level of less than substantial harm (in accordance with the NPPF), resulting in a non-significant effect.

F8.4 The Proposed Development would not result in any adverse effect to any other designated heritage assets located within the environs of the Development Site, including the Grade II Listed Lagnersh Farmhouse and Neal's Farmhouse.

Table F8.1 Summary of Archaeological and Cultural Heritage Impacts

Receptor	Heritage Value	Significance of Effect (prior to Mitigation)	Mitigation	Residual Effect
Pleistocene deposits (Figure F1: 9 see note)	Non-designated asset of high sensitivity	Minor Adverse	Embedded in design (preservation in situ within open space)	Negligible
Archaeological remains associated with Early Neolithic activity (Figure F1: 3 see note)	Non-designated asset of high sensitivity	Major Adverse	Preservation by record	Minor Adverse
Archaeological remains associated with Middle Bronze Age activity (Figure F1: 19 see note)	Non-designated asset of high sensitivity	Minor Adverse	Embedded in design (preservation in situ within open space)	Negligible

Receptor	Heritage Value	Significance of Effect (prior to Mitigation)	Mitigation	Residual Effect
Archaeological remains associated with Late Bronze Age activity (Figure F1: 2, 4, 6 see note)	Non-designated asset of high sensitivity	Major Adverse	Preservation by record	Minor Adverse
Late Bronze Age features (Figure F1: 1, 11 see note)	Non-designated asset of high sensitivity	Minor Adverseto Major Adverse	Preservation by record for areas within development groundworks	Minor Adverse
Iron Age features associated with occupation (Figure F1: 5, 7, 12, 16 see note)	Non-designated asset of high sensitivity	Major Adverse	Preservation by record	Minor Adverse
Iron Age pit/Holloway (Figure F1: 12 <sup>see</sup>	Non-designated asset of high sensitivity	Minor Adverse	Embedded in design (preservation in situ within open space)	Negligible
Area of focused Roman activity (Figure F1: 8 see note)	Non-designated asset of high sensitivity	Major Adverse	Preservation by record	Minor Adverse
Features associated with Roman settlement activity (Figure F1: 13, 14, 15 see note)	Non-designated asset of high sensitivity	Minor Adverse	Embedded in design (preservation in situ within open space)	Negligible
Late prehistoric features (Figure F1: 10 see note)	Non-designated asset of high sensitivity	Major Adverse	Preservation by record	Minor Adverse
Undated ring ditch (Figure F1: 18 see note)	Non-designated asset of high sensitivity	Minor Adverse	Embedded in design (preservation in situ within open space)	Negligible
Possible cremation pit (Figure F1: 17 see	Non-designated asset of high sensitivity	Minor Adverse	Embedded in design (preservation in situ within open space)	Negligible
Iron Age ditch not directly associated with settlement (Figure F1: H see note)	Non-designated asset of medium sensitivity	Minor Adverse	Embedded in design (preservation in situ within open space)	Negligible
Iron Age ditches and slit trench associated with	Non-designated asset of medium sensitivity	Minor Adverse	Embedded in design (preservation in	Negligible

Receptor	Heritage Value	Significance of Effect (prior to Mitigation)	Mitigation	Residual Effect
WWII airfield (Figure F1: M see note)			situ within open space)	
Undated hearth pit (Figure F1: P see note)	Non-designated asset of medium sensitivity	Major Adverse	Preservation by record	Minor Adverse
19th century buildings at Park Farm	Non-designated asset of low sensitivity	Moderate Adverse	Preservation by record	Minor Adverse
Grade II Listed Morrells Farmhouse (Figure F2: A <sup>see note</sup> )	Designated heritage asset of less than the highest significance	Minor Adverse	Embedded in design (green buffer zone and planting)	Minor Adverse
Grade II Listed Lagnersh Farmhouse (Figure F2: B see note)	Designated heritage asset of less than the highest significance	Negligible	None required	Negligible
Grade II Listed Neal's Farmhouse (Figure F2: C see note)	Designated heritage asset of less than the highest significance	Negligible	None required	Negligible

Note: All figure provided at Volume 2 to this ES

## F9.0 Abbreviations & Definitions

- **Designated heritage asset** A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.
- Heritage asset 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. Heritage assets include designated heritage assets, assets identified by the local
  planning authority (including local listing) and those identified through the planning
  process.
- **Historic environment** All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.
- Historic Environment Record Information services that seek to provide access to
  comprehensive and dynamic resources relating to the historic environment of a defined
  geographic area for public benefit and use.
- **Setting of a heritage asset** The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of the setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
- **Strip, map, record** A form of archaeological mitigation involving identification, partial excavation and recording of features within a machine-stripped area.
- **Trial trench evaluation** A form of initial archaeological investigation involving the excavation of trial trenches to provide information on the presence, nature, extent and significance of archaeological remains present on a site.
- Watching brief A formal programme of observation and investigation conducted during any operational phase carried out for non-archaeological reasons. This will be within a specific area or site on land, inter-tidal zone or underwater, whether there is the possibility that archaeological deposits may be disturbed or destroyed.

## F10.0 References

- 1 Planning (Listed Buildings and Conservation Areas) Act 1990', Act of UK Parliament
- 2 Ministry of Housing, Communities and Local Government (2021); National Planning Policy Framework
- 3 Arun District Council 2018 *Adoption Arun Local Plan 2011-2031* (July 2018) https://www.arun.gov.uk/download.cfm?doc=docm93jijm4n12844.pdf&ver=12984
- 4 Ministry of Housing, Communities and Local Government (2019) *National Planning Practice Guidance: Historic Environment*
- 5 Chartered Institute for Archaeologists (2020) Standard and Guidance for Historic Environment Desk-Based Assessment
- 6 English Heritage (2008) Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment
- 7 Historic England (2015) *Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment*
- 8 Historic England (2017) *Historic Environment Good Practice Advice in Planning Note 3:*The Setting of Heritage Assets (Second Edition)
- 9 Endacott, S. (2019) *Bognor Advanced Landing Ground*, Bersted Parish Council <a href="https://www.bersted-pc.gov.uk/">https://www.bersted-pc.gov.uk/</a>