

Historic England

SOUTH EAST OFFICE

Mr Michael Eastham  
Arun District Council

Our ref: P00945758  
17 July 2018

Dear Mr Eastham

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

**LAND TO WEST OF CHURCH LANE SOUTH OF HORSEMERE, GREEN LANE,  
CLYMPING**  
**Application No. CM/13/18/OUT**

Thank you for your letter of 28 June regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

We previously submitted advice on this development on 9 February 2017. Our advice letter stated that we had concerns regarding the application on heritage grounds, and that the application did not comply with the NPPF (in particular, paragraphs 128, 129, 132 and 139). In particular, we were concerned that the degree of harm posed by the proposal had not been adequately assessed and demonstrated in relation to:

- The impact on the setting of Climping's historic core, and on the rural nature of the Church Lane approach
- The expected impact on flood risk and the local hydrological regime, and consequent impacts on the preservation of Climping's historic core and buried remains within the scheduled Deserted Medieval Village (DMV)
- Whether the proposed development site contains any archaeological remains that are related, and of equivalent significance, to the DMV; and the expected impact of the development upon them

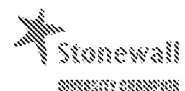
Further documents have now been submitted which we think address and satisfy our previous concerns. We provide further explanation below.

*Impact on Setting*

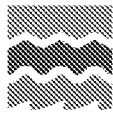


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An Additional Heritage Assessment (ASE, 2017) has now been submitted which assesses in more detail the development's impact on the setting of Climping's historic core. We note that visualisations of the expected effect of increased lighting were not provided as we recommended. We nevertheless agree with the assessment's conclusion; that the development's impact upon the area's rural nature and the setting of the historic core will (following proposed mitigation) be low.

To ensure the development's impact on setting is indeed minimised and mitigated to the expected level, we also agree with recommendations provided within the Noise, and Landscape and Visual Assessments, notably: that the detailed design stage include a refined planting scheme to mitigate visual impact, and further noise assessment.

*Flood Risk and Hydrological Regime*

Two reports (by Ambiental Environmental Assessment and Environmental Consulting Ltd) were submitted to address the expected impact of the development on flood risk and the local hydrological regime. The reports convincingly demonstrated that the impact on flood risk and the local water regime would - following proposed mitigation - be minor outside the application site, and were not expected to cause any significant change to preservation within the scheduled monument.

*Non-designated Archaeology*

We understand that the district archaeologist, James Kenny, was consulted with regards to potential harm to non-designated archaeology. He advised that a programme of trial trenching should be carried out ahead of development; to investigate both the general archaeological potential of the site and the potential for remains related (and of equivalent significance) to the nearby scheduled monument. Mr Kenny stated that evaluation by trial trenching should ensure that any archaeological interest the site may contain can be properly preserved, either *in-situ* or by further investigation, as appropriate. We agree with and support Mr Kenny's recommendations.

*Policy*

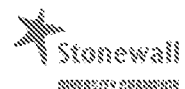
Under the NPPF it is a core planning principle to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (para.17 NPPF). When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution

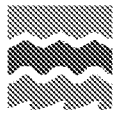


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made by their setting. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation (para. 128 NPPF).

Any harm or loss should require clear and convincing justification. An application should demonstrate that all less harmful alternatives have been carefully considered. If a proposal cannot be amended to avoid all harm, and the harm is less than substantial, this can be weighed against the public benefits of the proposal (para.132, NPPF).

Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets (para. 139, NPPF).

*Position*

Additional information has been submitted which adequately assesses and demonstrates the harm posed by the proposal (NPPF, para. 128). We agree that the development poses a low level of harm to heritage significance.

We consider that the current application satisfactorily addresses our previous concerns. We therefore have no objection to the application and consider that it now complies with the NPPF (in particular, paragraphs 17, 128 and 132).

We support Mr Kenny's recommendations that an archaeological evaluation of the site's potential should be carried out in advance of the development, and that this should include an evaluation of the site's potential to contain remains related to the scheduled DMV. We also agree that, if remains of demonstrably equivalent significance to the DMV are found, the master-plan should be amended to avoid harm to these remains, in accordance with the NPPF (para. 139).

**Recommendation**

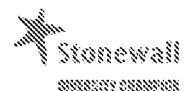
We agree that the development poses a low level of harm to heritage significance. In accordance with the NPPF (para. 132), we recommend that you weigh this harm against the public benefits of the proposal, when determining the application.

If planning permission is granted, we recommend that any planning application for reserved matters should include further noise assessment and a refined planting mitigation scheme. At this stage, further consideration might also be given to the most appropriate treatment of road surfaces and verges; in order to reduce impact upon the rural character of the area as far as possible.



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We also recommend that you continue to follow the recommendations of your archaeological advisor, James Kenny, with regards to the development's impact on non-designated archaeological remains and how this harm may best be avoided, minimised or mitigated.

We do not comment on the effect of the setting of grade II listed buildings but we recommend that you should consider this with advice from your own conservation specialist.

As the application may affect the setting of listed buildings, the statutory requirement to have special regard to the desirability of preserving the setting of a listed building (s.16, 1990 Act) must also be taken into account by your authority when making its decision.

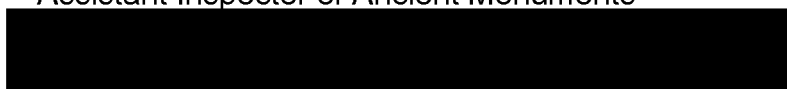
Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

Yours sincerely



**Maria Buczak**

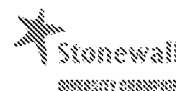
Assistant Inspector of Ancient Monuments



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