Sandra Edwards

From: Amanda Scholes on behalf of Planning.Responses
Sent: 17 May 2017 09:16
To: Planning Scanning
Subject: FW: Comments on CM/1/17/OUT - Land west of Church Lane, Climping

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From: Claire Potts
Sent: 16 May 2017 14:36
To: Planning.Responses
Subject: FW: Comments on CM/1/17/OUT - Land west of Church Lane, Climping

Please upload the addition Historic England response to CM/1/17/OUT

Thanks

Claire

Claire Potts BSc MSc MRTPI | Strategic Development Team Leader, Strategic Development, Arun District Council | First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
Internal: 37698 | External: +44 (0) 1903 737698 E-mail: claire.potts@arun.gov.uk
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From: Buczak, Maria [redacted]
Sent: 08 May 2017 12:48
To: Claire Potts
Subject: RE: Comments on CM/1/17/OUT - Land west of Church Lane, Climping

Certainly Claire,

Please find below my comments, I hope they are of use.

Summary

We consider that the development's impact upon heritage significance has been the subject of further assessment and is better understood. We do not however consider it to have yet been fully assessed; we note that the development's potential effect on the Scheduled Monument through potential changes to groundwater levels/conditions has still not been comprehensively addressed. We also note that visualisations were not provided to support statements concerning the effect of increased lighting on the setting of designated assets.

Overall, the development's impact upon the setting of St Mary's Church, the Scheduled Monument and Climping's Historic Core does appear to minimal. With mitigation, this impact is expected to be slight within 5 years and reduced to a negligible impact within 10-15 years.

To ensure harm will indeed be as low as expected, and mitigated as expected, we agree with recommendations (provided within the Noise, and Landscape and Visual Assessments) that at the detailed design stage: further noise assessment is carried out; and the proposal to introduce additional planting (to mitigate harm) is further refined.

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If these steps are carried out (and a more comprehensive understanding of the development's impact through groundwater changes is achieved) I don't envisage we would object to the development as it should cause minimal harm to heritage significance which should be reduced to a negligible impact in the long-term. We would be likely to recommend that you weigh the harm remaining within the proposal against the public benefits of the scheme (NPPF 139).

Noise

As highlighted within the Additional Heritage Assessment (AHA), the Noise Assessment does find that future traffic flows will have no noticeable effect upon Climping's designated assets or its historic core. The Noise Assessment also states that noise from the actual development itself (e.g. use of houses, shops, etc.) is *expected* to be minimal. We agree with the Noise Assessment's recommendation that further assessment is carried out at the detailed design stage, as certain variables which cannot be known until this stage could result in greater noise levels being experienced by sensitive receptors.

Visual Impact on Designated Assets

The Additional Heritage Assessment (AHA) considers that the development will have no visual impact upon St Mary's Church or the Scheduled Monument as views between these assets and the development will not be possible due to intervening mature, dense trees and buildings. On the basis of the photographs provided and a visit made to the site, we agree with this statement.

The AHA also considers that the screening these trees and buildings provide will also mean that these assets will remain unaffected by the effect of increased ambient lighting. Whilst we are unlikely to disagree with this statement, we note that it has not been proven or supported by visualisations (both during day/night), as we recommended.

Visual Impact on Climping's Historic Core

Whilst Climping's Historic Core should be shielded visually from the development by the same screening which shields St Mary's Church and the Scheduled Monument, the development may have some effect upon its setting due to impact the it would have on the approach along Church Lane.

As highlighted within the AHA, the Landscape and Visual Assessment finds that the approach along Church Lane will witness some negative effect – as (due to the road's fragmentary tree and hedge eastern boundary) some views towards the development will be possible and some impact through increased lighting will be felt. It states that, with proposed additional planting, this effect should be slight negative in 5 years, and negligible in 10-15 years. As a lot of green space is proposed within the design, it also highlights the scope which exists to introduce linear open space within the development to maintain the character of Church Lane. We agree that these mitigation methods should reduce harm to the setting of Climping's Historic Core (at least in the medium-long term), but also agree with the LVA assessment that the proposed mitigation is currently based on a broad brush stroke approach and would need to be subject to refinement and detailed design at a later stage.

Flood Risk and Hydrological Regime

We note there has been no new assessments commissioned but that the assessment of this aspect relies on the previous flood risk and surface water assessments. While these reports do confirm that surface water will flow away from the Scheduled Area and should cause no increased flood risk to it, there appears to have been no further assessment of how the development might impact the Scheduled Monument through its potential alteration of **groundwater levels and conditions** in the area. The existing reports do indicate that the development site itself will not be at risk of groundwater flooding, but does not explore whether this is true of the surrounding area. It should be noted that a decrease in surrounding groundwater levels, or changes to groundwater conditions, could also have a negative impact; groundwater flooding is not the only potential risk.

Undesignated Archaeology

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We agree with the approach of James Kenny (Archaeological Advisor for Chichester District Council) that a programme of trial trenching should be carried out in order to test the possibility that remains associated with the DMV might extend into the development site. As the AHA states, the results of this evaluation can then be used to determine the best approach by which development may take place; either through preservation in-situ (by design) or through mitigation by recording, depending on the significance of remains found. If water retention ponds are found to be untenable due to the harm they will cause to significant archaeology, consideration may have to be given to their relocation or to alternative schemes for drainage management.

Kind regards
Maria

From: Claire Potts [mailto:Claire.Potts@arun.gov.uk]
Sent: 02 May 2017 14:00
To: Buczak, Maria
Subject: RE: Comments on CM/1/17/OUT - Land west of Church Lane, Climping

Maria,

If you are able to provide comments at this stage, that would be appreciated.

Thanks

Claire

Claire Potts BSc MSc MRTPI | Strategic Development Team Leader, Strategic Development, Arun District Council | First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
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From: Buczak, Maria [redacted]
Sent: 27 April 2017 09:30
To: [redacted] Claire Potts
Subject: RE: Comments on CM/1/17/OUT - Land west of Church Lane, Climping

Dear Chris,

Many thanks for copying me into this email and for providing the Additional Heritage Assessment – I will look over it as soon as I get the chance.

Claire, I assume this will be submitted as an amendment to the planning application when the time comes. Would you like me to give any comments at this stage?

Kind regards
Maria

From: Chris Wojtulewski [redacted]
Sent: 27 April 2017 08:35
To: Claire Potts
Cc: Buczak, Maria
Subject: FW: Comments on CM/1/17/OUT - Land west of Church Lane, Climping

Dear Claire

I have now been provided with an amended version of the Additional Heritage Assessment. This removes a couple of typos in the version I sent you yesterday but otherwise the content is the same.

Regards

Chris

Chris Wojtulewski BA (Hons) MTP MRTPI - Director
Parker Dann Chartered Town Planning Consultants
Suite S10, Waterside Centre, North Street, Lewes BN7 2PE
[redacted]

From: Chris Wojtulewski[redacted]
Sent: 26 April 2017 12:44
To: 'Claire Potts'
Cc: 'J Kenn[redacted]
'Maria.Buczak@HistoricEngland.org.uk'
Subject: RE: Comments on CM/1/17/OUT - Land west of Church Lane, Climping

Dear Claire

Further to your email below, please find attached the required Additional Heritage Assessment. You will see I have also copied this direct to Maria Buczak at Historic England.

Regards

Chris

Chris Wojtulewski BA (Hons) MTP MRTPI - Director
Parker Dann Chartered Town Planning Consultants
Suite S10, Waterside Centre, North Street, Lewes BN7 2PE
[redacted]

From: Claire Potts[redacted]
Sent: 21 March 2017 14:31
To: Chris Wojtulewski
Cc: J Kenny [redacted]k; Martyn White
Subject: FW: Comments on CM/1/17/OUT - Land west of Church Lane, Climping

Chris

Please see comments from Historic England below with details about what they require. I hope this helps. Once you considered, please let me know how you plan to proceed with this aspect.

Kind regards

Claire

Claire Potts BSc MSc MRTPI | Strategic Development Team Leader, Strategic Development, Arun District Council | First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
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From: Buczak, Maria [redacted]
Sent: 21 March 2017 09:53
To: Claire Potts
Subject: RE: Comments on CM/1/17/OUT - Land west of Church Lane, Climping

Dear Claire,

Thank you for your email, and apologies for the delay – I have been on leave for a week and am just trying to catch up with everything now. I will try to answer your questions below:

Request for further assessment of the development's impact on the setting of Climping's historic core

We asked for an assessment of how the development will impact specifically upon the setting of Climping's historic core (i.e. the church, DMV and reduced village as a whole), as we did not feel this had been addressed in the application. Such a setting assessment could be easily commissioned from an archaeological contractor, as they are used to carrying out such studies. It could be a new assessment, or constitute an update to the original DBA that was previously submitted.

The assessment should involve a written description of the historic character and heritage significance of Climping's historic core, and identify what aspects of its setting (i.e. the surroundings in which it is experienced) currently contribute to that significance. Aspects which might contribute to this significance may, for instance, include important views between and from its different components, rural views from and around it, the undeveloped and enclosed nature of its roads and lanes which give it a sense of seclusion and separation from the larger modern village, low noise levels, etc.

Once this has been established, the assessment should consider how the development will impact upon those various aspects and to what extent. For instance; how and to what extent will important views from and within the historic core be changed by the introduction of new houses, lighting and infrastructure; how noise levels within and around it might be changed; how changes to Church Lane and the land adjacent might change peoples' experience of the approach to the historic core and thus their understanding of it. Within the application, I noticed that there is some tree screening and a green buffer zone proposed in the north-east of the site. The assessment should thus also consider to what extent these mitigation methods will reduce the development's impact on the setting of the historic core, and whether further mitigation might be needed to completely avoid impact or at least reduce it to a minimum.

As part of this assessment, we would like to see visual representations of the development's expected level of harm on Climping's historic core. By this, I mean photographs or drawings of views that have been identified as integral to the historic core's setting (e.g. views along the Church Lane approach to the village, rural views, etc.). These views should be presented, with the expected impact of the development included in them. For instance, a view from Church Lane across the currently empty field should be remastered to include the houses and development that would be visible once the development were completed. Views should be demonstrated for both day and night (to understand how additional lighting might affect the current nightscape from the historic core); and for summer and winter (to understand whether leaf loss during winter might affect how well screening is mitigating impact year-round).

All assessment should be carried out in accordance with Historic England's guidance on the setting of heritage assets (http://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/). You might like to note that a revised version of this good practice advice is currently open to public consultation and we anticipate that a new version will be available during the next stages for this project. We do not however anticipate fundamental changes to our preferred approach.

Non-designated remains

I am very happy with James' suggestion for a standard condition to ensure trial trenching is carried out. We do not usually get very involved with non-designated remains, however we are more interested in this case as there is a chance that remains relating to the nearby DMV could extend into the development site. If no such remains are found during the trial trenching, we will be happy to leave any further mitigation for non-designated remains in James' hands.

If such remains are found, they may be of equivalent (national) significance to a designated asset and should be treated as such. In that case, we would be more involved; and would probably ask for the development to be further amended to avoid harm to any such nationally significant remains; or at least for further mitigation (archaeological evaluation/monitoring) to be put in place.

Flood Risk and the Local Hydrological Regime

This assessment should be undertaken in compliance with Historic England's guidance on preserving archaeological remains (<https://www.historicengland.org.uk/images-books/publications/preserving-archaeological-remains/>). This document does give very good advice on what should be included in such an assessment, how to go about completing one and the amount of detail needed; so I'm sure would be useful to the applicant.

I imagine the simplest thing to do might be for the applicant to commission such an assessment (in line with the above guidance) from a suitable specialist, for instance the company that did the surface water drainage assessment (Ambiental Technical Solutions (specialists in flood modelling and flood risk assessment)). I am not sure if they deal so much with ground water changes and preservation assessment, but they may always be able to advise on companies that could. Ambiential would no doubt also be able to suggest sustainable drainage strategies which would be most suitable to dealing with any identified flood risks or hydrological changes on the site. They might want in particular to explore *alternative options to retention ponds* as these would no doubt require a lot of excavation which (depending on the results of the trial trenching) could end up impacting a lot of archaeology. If several drainage strategies are found to be viable, we would be very happy to advise (in conjunction with James) which would cause least harm to heritage.

I apologise for the very long e-mail, I hope it is helpful and not too much detail in the wrong places! If you require any further clarification please don't hesitate to get in touch – as I can get in touch with other colleagues also, many of whom may be able to provide further suggestions that are of use.

Kind regards
Maria

Maria A Buczak
Assistant Inspector of Ancient Monuments for Kent, Sussex and Surrey
Development Management Team: Planning Group
Historic England: Eastgate Court, 195-205 High Street, Guildford, GU1 3EH
[redacted]

Historic England

ARUN DISTRICT COUNCIL CM/1/17/OUT

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From: Claire Potts [mailto:Claire.Potts@arun.gov.uk]
Sent: 17 March 2017 11:56
To: Buczak, Maria; J Kenny[redacted]
Subject: Comments on CM/1/17/OUT - Land west of Church Lane, Climping

Dear Maria,

I've been looking through your comments on the above application and just wanted a bit more clarity on what would be required to address your concerns. In terms of the impact on the setting of Climpings historic core you say that the expected low level of harm to the setting has not yet been adequately demonstrated by detailed assessment or visualisation. Please could you advise on what you would expect to see in order to demonstrate this further?

In relation to the non-designated archaeological remains, James has suggested that a standard condition to ensure trial trenching is carried out would be sufficient. Do you concur with this approach?

In relation to the effect of the development on flood risk and the local hydrological regime and consequent impact on the preservation of Climpings historical core and buried remains, do you have a suggestion for how this could be assessed by the applicants?

Kind regards

Claire

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