

-----Original Message-----

From: [REDACTED]
Sent: 10 December 2018 22:53
To: David Easton <David.Easton@arun.gov.uk>
Cc: [REDACTED]; Martyn White <Martyn.White@arun.gov.uk>
Subject: Historic England advice on case PL00516144

Dear Mr Easton

I am writing in relation to the following:

EIA: Environmental Impact Assessment
Ford Airfield Ford, West Sussex
[Case Ref. PL00516144; HE File Ref. ; Your Reference.]

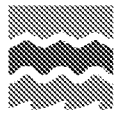
Please do not hesitate to contact me if you require any further advice or clarification.

Yours Sincerely

Maria Buczak
Assistant Inspector of Ancient Monuments
E-mail: [REDACTED]
Direct Dial: [REDACTED]

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Mr D Easton
Arun District Council

Direct Dial: [REDACTED]

Our ref: PL00516144
10 December 2018

Dear Mr Easton

Historic England Advice

re: Scoping Opinion: proposed development at Ford Airfield, Ford

Summary

Thank you for consulting Historic England on a scoping opinion relating to the above site. We agree that historic environment issues should be included in the scope of an Environmental Impact Assessment.

The proposed development site has a high potential for buried archaeological remains, which could potentially be of local, regional or even national importance. Ford Airfield itself is also a historic site, which contains both standing and below-ground remains which contribute to its heritage significance. The historic landscape character, and the setting of other heritage assets outside the site, may also be affected by the proposed development.

A comprehensive understanding of the baseline conditions is necessary in order to design proposals that will minimise harm to the historic environment and maximise and opportunities for enhancement that may exist. Once that work has been carried out, we recommend that the applicant should reassess their Master Plan in order to identify ways in which careful design could improve the outcome for the historic environment.

Consultation

Historic England is the statutory consultee regarding heritage assets of the highest designations, including Scheduled Monuments, and Grade 1 and 2* Listed Buildings and Registered Parks and Gardens. Historic England may also comment therefore on other heritage assets and the historic environment in general, and in this case we propose to do so because of the size of the proposed development. However, we anticipate that the primary source of your advice will be the Conservation Officer for Arun District Council, and the Chichester District Archaeologist (James Kenny).

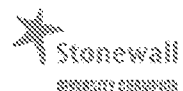
Heritage significance - Character and Setting of Heritage Assets

Although the development site contains no designated heritage assets, the Scoping Report recognises that there are a number of listed buildings, a scheduled monument

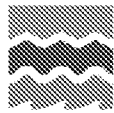


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and a conservation area in the immediate surrounding area. We agree that the impact of the development on the setting of designated heritage assets should be scoped into the EIA (Scoping Report: 5.7).

We do not, however, necessarily agree with the scope of designated assets that have been highlighted for assessment; or the way in which they are proposed to be assessed. The scoping report identifies only five listed buildings within the vicinity of the development (all to the east of the development site), when there are at least twenty-five listed buildings within 1km of the site's boundary. It also fails to explain the reason those five buildings have been chosen for assessment.

The report also states that the development site is "considered to lie beyond the settings of all designated heritage assets (with the exception of Atherington House) as there is no inter-visibility between them and the site" (Scoping Report: 5.4). We do not agree with this statement and would like to highlight that setting is the surroundings in which an asset is experienced, and should not be conflated simply with inter-visibility.

As Historic England's published guidance on the setting of heritage assets states (Good Practice Advice in Planning Note 3: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>) there are many potential attributes that may make up an asset's setting, and these are not all visual. Noise, odour, vibration, dust, ambient lighting levels, traffic, a sense of openness/enclosure or remoteness/busyness; all may form part of (or impact upon) the setting of an asset, even in the absence of views. We therefore do not think that any statements about the setting of designated heritage assets (or whether they will be impacted upon by the development) can be made at this stage, before full assessment within the EIA.

Although undesignated, the surrounding villages (Yapton, Climping and Ford, all of which have historic origins) and the landscape in which they sit also have heritage significance. The absence of urban development; the predominance of small, isolated settlements; and the intrinsically rural and agricultural character of the whole are all integral characteristics of this part of the West Sussex coastal plain - which contribute to a holistic appreciation of its past, and the heritage significance of its component parts.

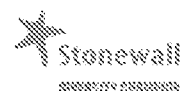
Ford airfield itself also retains heritage significance, as an airfield originating in WWI. It continued in use variously, as a training base (1937), an active RAF airfield during WWII, and a prison (1961). Its original use by the American Air Force, and its later acquisition and use by the Ford Motor Company, are both characteristics which make this airfield rare, and contribute to its overall heritage significance.

Some original and altered features of the airfield survive above-ground, both in and next to the development site. These include parts of the runway, and buildings adapted for use within the later prison. The setting of these individual assets, and the

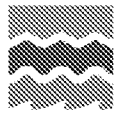


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character and visual amenity of the airfield as a whole, all have a bearing on the understanding and appreciation of its heritage significance. There is also a memorial garden in the vicinity which commemorates those who flew at the airfield and contributes to its appreciation.

Heritage significance - Archaeology

The desk-based assessment demonstrates a high potential for buried archaeological remains within the development site, in particular relating to the airfield, and to Bronze Age, Iron Age and Roman agricultural (and possibly settlement) activity. The site's high level of archaeological potential is exemplified by the fact that the site encompasses an entire Archaeological Notification Area.

We think that the desk-based assessment and the report on the geophysical survey already produced comprise a comprehensive review of the likely archaeological potential. We do, however, note that the DBA concludes that any remains are "likely to be of no more than local significance" (para. 4.3). We do not think this statement is demonstrable at this point.

Indeed, we think that there is a reasonable possibility that remains of regional or even national significance could be present at this site. This is both because of the density of archaeological remains evidenced, and the types of site that are expected (for example, prehistoric and Roman field systems and settlement; a number of examples of which have been scheduled elsewhere within the country). It should also be noted that if any non-designated remains are discovered which are of equivalent significance to a designated asset, they should - in accordance with the NPPF - be considered subject to the same policies for designated heritage assets (para. 194, footnote 63).

We agree that archaeological evaluation of the site should be undertaken in order to identify the archaeological potential of the development site; and the likely significance of any archaeological remains which do survive.

Assessment of significance

Effects on the settings of designated and non-designated heritage should be assessed, and demonstrated clearly, regardless of whether or not they are inter-visible with the site. The development's impact on the character of the historic landscape as a whole should also be assessed.

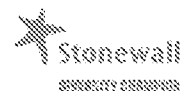
We would expect published guidance on the setting of heritage assets (*Historic England Good Practice in Planning Note 3*) to be consulted. We would be pleased to provide further advice as to the adequate application of the guidance, including the selection of assets to be the subject of detailed assessment.

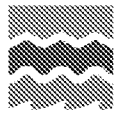
If necessary, accurate visual representations of the levels of possible harm should be presented to designated and non-designated heritage assets. We suggest that the



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applicant should confirm their approach to use of photomontages with regard to the historic environment.

The heritage significance of Ford Airfield should also be assessed, and evaluated in relation to other (designated and non-designated) historic airfields across the country. The development's impact on the remaining standing and buried remains of the airfield, and on its appreciation and understanding as a whole, should also be comprehensively assessed within the EIA.

The Scoping Report states that archaeological evaluation will be carried out in order to inform the assessment of effect. We recommend that you consult James Kenny (Chichester District Archaeologist) when designing the appropriate form, scope and methodology of fieldwork to best understand the significance of buried archaeological remains.

The applicant should be aware of the possibility of encountering non-designated archaeological remains of national significance, and the implications that this would have in planning terms.

Heritage input to Master Plan

Any Master Plan for the development should be informed by a good understanding of the heritage significance of the place. An optimum balance between development and conservation, which meets the criteria of the NPPF and has credible costed provision for appropriate mitigation, can only be achieved with the benefit of a good understanding of heritage significance.

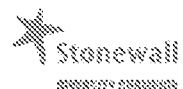
The results of archaeological field assessment should be used to inform the Master Plan. The applicant should seek to reduce impact upon archaeological remains, the setting of heritage assets, and the appreciation and character of the airfield, through careful design of development layout. For example, in relation to the airfield, there may be opportunities to retain to some degree the setting, views and sight-lines between assets associated with the airfield; the location and orientation of the runways might be incorporated into the design; and there might be opportunities to add elements of interpretation, such as heritage information boards or in the nomenclature of new features.

There are a number of other airfields that have been developed in recent years, but they have had varying degrees of success in achieving sustainable development that appropriately conserves their historic origins. Consideration of the success in this respect of other comparable developments would also usefully inform this application. This fundamental heritage assessment and design work should take place before the quantum of development or the Master Plan is approved, or planning permission granted.

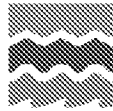


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The Conservation Officer for Arun District Council and the Chichester District Archaeologist should be consulted on the setting of non-designated assets, conservation areas and grade II listed buildings; and on the impact upon archaeological remains. While Historic England would anticipate complementing and not duplicating their advice, we will be pleased to advise further in relation to the points we have made in this letter, and can provide further advice about the issues raised, if requested, in due course.

Yours sincerely



Maria Buczak

Assistant Inspector of Ancient Monuments

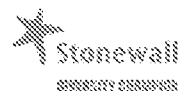


cc: James Kenny, Chichester District Archaeologist
Martyn White, Principal Conservation Officer for Arun District Council



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