



From: David Easton
Sent: 16 January 2019 14:38
To: Planning.Responses
Subject: FW: F/19/18/EIS

Could the below email please be uploaded as a consultation response from the Conservation Officer.

Many thanks,
David

From: Martyn White
Sent: 13 December 2018 15:52
To: David Easton <David.Easton@arun.gov.uk>
Subject: F/19/18/EIS

F/19/18/EIS

The site covers the historic airfield at Ford and as such covers a significant area of land. There is potential for a number of different heritage assets to be affected as a result of any development in this location.

The NPPF defines a heritage asset as: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

A comprehensive understanding of both the site and the local area is necessary in order to assess the impact of any development upon any known assets. This understanding will then inform any design proposals that will minimise harm to the historic environment. I provide the following comments:

Designated Heritage Assets

Whilst I agree that the impact of the development on the setting of designated heritage assets should be scoped into the EIA (Scoping Report: 5.7), I do have some concerns regarding the assets that have been identified.

Whilst the development site does not contain any designated heritage assets, the Scoping Report recognises that there are a number of listed buildings, a scheduled monument and a conservation area in the immediate area of the site. However, the report only identifies 5 listed buildings within the vicinity of the eastern side of the site. A simple map assessment identifies that there are a number of listed buildings all around the site which warrant further consideration (including some within the aforementioned conservation Area). It is not clear why these five buildings were identified.

Reference is made to the settings of the five listed buildings, with the conclusion that the development site is "considered to lie beyond the settings of all (of the assessed) designated heritage assets (with the exception of Atherington House) as there is no inter-visibility between them and the site" (Scoping Report: 5.4).

It is not clear how this assessment was made, especially as the definition of setting does not just relate to a visual relationship. It is therefore not clear how the Good Practice Advice in Planning Note 3 from Historic England has been used as part of this desk top assessment.

As a consequence, it is considered that such an assessment cannot be made at this stage, prior to a more detailed assessment being undertaken on a number of assets in the local area. As a consequence, heritage should not be ruled out of further assessment.

Non-designated Heritage Assets

Further, whilst reference is made to designated and non-designated Heritage Assets, the report appears to focus on Listed Buildings. There does not appear to be any reference to those non-designated assets in the local area. An assessment of the local area identifies that there are a number of buildings identified by the Council as a 'Building or Structure of Character' (Local List). These assets appear to be missing from the assessment; paragraph 5.6 of the scoping report identifies all of the assets to be considered. It is considered that these assets should be identified and considered as part of the assessment.

Details of the buildings included on the list can be located on the Council's website, and a GIS map layer provided on request.

Ford Airfield

Reference is made to the fact that the airfield itself is also a historic site which contains both standing and below-ground remains which contribute to its heritage significance. As such, the airfield should be assessed in further detail as part of the assessment.

Further Assessment

It is considered that the effects on the settings of both designated and non-designated assets should be assessed within a specified distance, regardless of whether or not they are inter-visible with the site.

The assessment should be undertaken in accordance with the relevant guidance notes from Historic England. Information should be displayed both in written and visual formats in required to justify a point.

For Information

The Heritage desk based assessment was undertaken in 2016, and as a consequence references are made to the saved policies of the Arun Local Plan 2003. This information is no longer correct as the Arun Local Plan 2018 was adopted by full Council on the 18 July. References to policies should be updated.