



Historic England

Sir/Madam Strategic Planning
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Direct Dial:

Our ref: PL00731922

14 January 2021

Dear Sir/Madam Strategic Planning

FORD MASTERPLAN CONSULTATION
Application No. F/4/20/OUT

Thank you for your letter of 14th December regarding the above application for planning permission. Based on the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The application is for outline planning consent for the development of land at Ford Airfield. The proposed development site has high potential for prehistoric and Roman archaeology, which is likely to be of at least regional significance. The airfield is an important site in the development of military and civil aviation, and as such is also of at least regional significance. In addition, there are listed buildings and a conservation area in the wider landscape that may include the proposed development site in their settings.

The scheme has the potential to cause harm to both designated and undesignated heritage assets of national importance; in the case of archaeological deposits the level of harm could be substantial. There is also an opportunity to provide enhancement and secure heritage benefits as part of the scheme.

Sufficient baseline information on the significance of and impact to the historic environment has not yet been provided; we are not satisfied that the scope and quality of the historic environment assessment is sufficiently robust to inform the decision-making process.

Historic England do not object to the application in principle, but think that significant further work by the applicant is required to demonstrate that conservation and enhancement of heritage assets has been adequately achieved, and harm to the historic environment has been avoided, minimised and appropriately justified, as detailed in the NPPF.



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Historic England Advice

The application

The application is for outline planning consent for the development of land at Ford Airfield, to include up to 1,500 dwellings, a care home, up to 9,000 sqm of employment floorspace, a local centre of up to 2,350 sqm (mixed retail/commercial and community/leisure), a primary school, public open space and other facilities and infrastructure, plus demolition of existing buildings and part removal of existing runway hardstanding.

The submitted Masterplan is supported by an Environmental Statement (ES), the heritage section of which is based on a Desk-Based Assessment (DBA) and geophysical survey.

Significance of the historic environment

1. Designated heritage assets surrounding the site

There is a grade I listed church, and a group of grade II listed buildings in each of Climping, Ford and Yapton villages. Climping also contains a scheduled monument (the deserted medieval village). Yapton includes a Conservation Area. The three parish churches are all Norman in origin and likely to be historically associated with each other. Despite being relatively low churches without spires, they may have settings extending across the surrounding landscape that could be affected by the proposed development.

The Zone of Theoretical Visibility (ZTV) included in the application indicates that there may be some direct inter-visibility between the proposed development site and these three settlements, although setting relationships may also be based on co-visibility from other points in the landscape, and may relate to how these assets are experienced not just views.

Detailed consideration of each designated asset, its character and surroundings would be required to determine whether setting could include the proposed development.

2. Ford Airfield

The former airfield is a significant historic landscape, and contains some examples of associated built heritage, for example, a submerged Cold War monitoring post buried north of the sewage treatment works.





Ford Airfield was in use by the Royal Flying Corps and American forces between 1918 and 1920. The First World War airfield was apparently dismantled, but it was reused for commercial purposes during the 1930s before being occupied by the Fleet Air Arm as a training site (named 'HMS Peregrine') in 1938. The airfield was hit very badly by a Luftwaffe attack in August 1940, during which the 1930s buildings were severely damaged. The RAF then occupied the airfield and used it as a base for intruder squadrons and, later in the Second World War, fighter-bomber sorties. By the end of the War, numerous buildings appear to have been ranged around the airfield.

Ford Airfield returned to Navy use in 1945, after the Second World War. The Navy's first jet fighter unit was established there in 1951, flying Supermarine Attacker aircraft. The airfield was decommissioned from military use in 1956 and functioned as a civilian airfield until 1980. Since the airfield was decommissioned relatively early, most of its buildings have been heavily altered or demolished during its post-MoD history. The large hangars and the large concrete hardstanding to the north-east of the runway intersection are post-war in origin. There were originally an extensive group of shelters and fighter pens, but most had been removed by the time of an English Heritage survey in 1998, although some may survive archaeologically. The control tower has also been demolished. However, most of its two distinctive runways remain.

Ford Airfield is significant because of its historic interest and, to a lesser extent, its research interest, and 'aesthetic interest' as a frequently used place in which people engage with their national past.

It was a highly notable 'intruder airfield' that was heavily involved in two of the most significant engagements of the Second World War: the Battle of Britain and D-Day. Also of historic interest is its activity during the First World War. The airfield's use by the Royal Navy is of historic interest and also research interest, because airfields with Navy associations are less well understood than their RAF counterparts. The runways and a limited number of buildings within the former airfield illustrate its history during wartime and also in the development of civil aviation. The importance of the airfield's military aviation history is reflected by the annual memorial service and maintenance of a memorial garden.

3. Undesignated archaeology

The proposed development site is in an area of high potential for survival of significant archaeological remains dating from prehistoric and Roman periods, as well as dating to the 20th century military history.

Previous discoveries near the proposed development site have included prehistoric remains of most periods, and remains of a character that is likely to be wide-ranging, such as field systems and accompanying features dating to the late Bronze Age and the Iron Age. Roman activity is also well represented in previous investigations near to





the proposed development site. The geophysical survey has identified several areas containing groups of anomalies that indicate the presence of archaeological remains. These anomalies are of a size, appearance and character that suggest the presence of a more wide-ranging, multi-phase archaeological landscape, probably of regional or national significance.

Other archaeological remains may be present on the proposed development site that are not detectable through geophysical survey. For example, the discovery of Mesolithic artefact scatters during nearby excavations indicates that similar assets may be present, but which would be detectable only through intrusive survey.

Impact of the proposals

The evidence provided by the applicant does not explain the impact that the proposed development would have on designated built heritage assets due to alteration within their settings, sufficiently to inform the determination.

There may be alterations to those assets' settings as a result of changes to co-visibility from other points within the landscape, or from indirect effects such as alterations to the experience of these sites through traffic, light or noise, which the ES has not addressed. We therefore disagree with the ES conclusion that there would be no effect on designated assets, as this has not been demonstrated.

The proposed development would have an adverse effect on the significance of the historic airfield both due to physical impact on the airfield runway (one arm of which would be removed), and due to the loss of its open, grassed character and setting.

The ES reports an impact of moderate adverse Significance of Effect on the western arm of the runway (only) due to its physical removal. We cannot agree with this assessment as insufficient investigation has been carried out to justify the applicant's assessment that the runway is of low significance. We believe that further investigation of the airfield in its national context may demonstrate it to be of a higher level of significance (regional or national). Furthermore, there would be harm to the historic landscape character and setting of the airfield, a consideration that is not addressed in the ES.

The proposed development is likely to have an adverse impact on undesignated buried archaeological remains. We agree with the findings of the ES that earth-moving activities during construction would harm buried remains of prehistoric and Roman periods, and remains of the 20th century airfield. However, we disagree that the Significance of Effect would necessarily be moderate adverse because we do not believe the applicant has demonstrated with any security that all remains at the site are of low (or local) significance. If nationally important remains are present, the





impact on them could be major adverse in the ES methodology, or equivalent to substantial harm.

Detailed comments on the supporting material

1. The settings of designated assets

1.1 Previous comments

Historic England previously provided comments on the scoping opinion to the EIA for this site in our letter dated 10th December 2018. In that letter we highlighted that any Masterplan for this site should be informed by a good understanding of the heritage significance of the proposed development site.

We highlighted that while the site contains no designated heritage assets, there are listed buildings including grade I listed churches, a scheduled monument and a conservation area in the surrounding area. In addition, the surrounding villages (Yapton, Climping and Ford, all of which have historic origins) and the landscape in which they sit also have heritage significance.

We raised concerns that the scoping report only identified five listed buildings within the vicinity of the development site that have the potential to be impacted upon when there are at least twenty-five listed buildings within 1km of the site's boundary. It also failed to explain the reasons why those five buildings to the north were specifically identified.

We also noted that the scoping report stated 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 did not agree with this statement and highlighted that our published guidance on the setting of heritage assets (Historic England Good Practice in Planning Note 3) defines setting as 'the surroundings in which an asset is experienced' and should not be solely limited with inter-visibility.

1.2 Further comments

We note that the current Masterplan document makes very limited reference to any potential impacts on setting of designated and non-designated heritage assets. This is despite the wheel diagram in the constraints section of the document containing a portion on Built Heritage and stating that the Masterplan proposals will have regard to its proximity to listed buildings. However, how this regard has been taken into account in the proposals is not explained.





It is also not clear from the Masterplan document that our request for the proposals to be informed by a full understanding of heritage significance has been carried out. 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 fully made at this stage.

It should also be noted that if a negligible effect on any listed building is recorded (as is the case for Atherington House grade II), recent case law has made clear that the assessment of an effect on a listed building as negligible does not alter the requirement to give that harm special regard when making a planning determination.

2. Buried archaeological remains

The heritage assessment that supports the Masterplan is not of sufficient scope to demonstrate that nationally important non-designated buried archaeological remains are not present on the site.

The results of the assessment are not presented with sufficient detail to form a good understanding of the heritage significance of the proposed development site.

The DBA lacks a gazetteer, which means that the baseline information is not presented in an easily useable format cross-referenced with the figures. The impact assessment presented in the ES (cf. Table 8.5) amalgamates all heritage assets into two groups, designated and non-designated, providing a single scoring for each group rather than assessing impact on each heritage asset. Grouping assets in this way fails to explain their significance adequately and neglects to consider characteristics that may have a bearing on their capacity to withstand harm. The widespread nature of the harm and variations in degree of harm across the site are not addressed, the effect of which is arguably to underestimate the degree of harm that would result.

The DBA lacks consideration of the history and archaeology of the locality or region in which the proposed development is located. It is unfortunate that the assessment has not demonstrated a greater understanding of the type and character of archaeological sites found in this region, as this would have informed assessment of the significance of the geophysical survey results.

The geophysical survey report identifies groups of anomalies interpreted as probably indicating the presence of archaeological remains, plus linear anomalies that may be field boundaries unrelated to those shown on historic maps. These groups, which are spatially divided and different in character, are not discussed in detail in the ES, or considered as individual assets. The anomalies interpreted as being associated with the airfield are also not discussed in any detail that would inform assessment of their significance or distribution.





The ES states that the groups of probable archaeological remains identified by geophysical survey are of 'local' significance. Without intrusive fieldwork, the evidence base provided is insufficient to support this assessment. The potential has not been properly addressed that these large areas of archaeological remains may be of greater significance, possibly of regional or national importance. These deficiencies render the ES inadequate to understand how the proposed development would affect buried archaeological remains if the Masterplan were enacted in its current form.

The potential for archaeological remains that are of periods or physical characteristics not detectable by geophysical survey has also not been addressed.

The discovery of Mesolithic artefact scatters at several of the few previous excavations near the proposed development is particularly notable, since the geophysical survey would not have located similar remains. The ES therefore does not assess whether significant remains of this early period in prehistory are present on the proposed development site, despite evidence suggesting that they may be present.

We also disagree with the highly unorthodox position taken by the ES that the residual effect on non-designated archaeological remains would be beneficial due to the research and investigation work that would be undertaken as mitigation. Archaeological work of a scope proportionate to the impacts could never achieve more benefit than the harm it is designed to mitigate.

The ES's position also does not concur with the NPPF's statement that recording of assets should not be a factor in deciding whether their loss should be permitted (NPPF para 199).

3. Aviation heritage

The ES states that the buried remains of the airfield are of 'local' significance. At Scoping stage, we requested an assessment of the significance of the airfield in its national context, but this has not been provided. The ES also makes no assessment of the significance of, or impact on, the historic landscape character. This means that insufficient information has been provided to support the determination. Similarly, the surviving concrete airfield runways are assessed in the ES as being of 'local' significance, but no supporting comparison with other airfields appears to have taken place.

Complete removal of the western arm of the runway would result in the loss of its cruciform shape, which is integral to the unusual character and significance of the airfield. The line of the runway on the western side would be retained as open space, but this would not mitigate its loss, physically or as a key element of the character and appearance of the airfield. While the loss of some of the extreme ends of the runway might be borne without a high degree of loss of significance, complete loss of one arm





would have a high adverse impact on this heritage asset. We therefore disagree with the conclusions of the ES in this respect.

4. Sensitive design to conserve or enhance the significance of the historic environment

We welcome the Masterplan's incorporation of the former route of the Portsmouth to Arundel canal into the open space of the northern area of the proposed development site. This presents opportunities to provide interpretation to commemorate its place in the landscape and increase public knowledge of its role in the evolution of the site, which should be developed as part of future applications.

There are further opportunities for the heritage of the airfield to inform the design and thereby reduce the adverse impact on it. In particular, the cruciform arrangement of the runways is very unusual and distinctive, and consideration should be given during master planning to its conservation. As with the canal route, public art, paving treatments and other forms of interpretation should also be developed to illustrate and celebrate the site's aviation heritage.

We are pleased to see that the Masterplan retains the central section of the runways' cruciform shape, although loss of the western arm is unduly harmful to its character. Its reuse as a green space, called "Runway Park" would be a partial mitigation of that loss, but it would be more in line with planning policy to avoid its loss altogether by retaining at least some of the existing runway surface on all four sides and making better use of the centre of the cross as a focal point of the development. There should also be a very clear connection retained, and enhanced by interpretive materials, between the centre of the runways and the memorial adjacent to the western runway arm.

The Masterplan appears to retain the sightlines along the runways. This is a welcome design feature as it would permit visitors to experience the character and some of the scale of the former airfield landscape. Care must be taken during detailed design that tree planting, signage and similar factors do not hinder this retention of this significant part of the airfield's setting and views.

We welcome the intention stated in the Built Form and Layout Character Strategy that, "The Southern Neighbourhood will express the legacy of the site's glorious past as an airbase", although this approach should not be restricted to the southern part of the proposed development. Further details should be provided to explain how this would be achieved.

The historic legacy of the airfield would serve well to engender the unifying "degree of commonality" throughout the proposed development that the applicant intends to create, as the airfield is the dominant element of the whole site's historic landscape





character.

The Masterplan should not be agreed until the heritage significance of the site and its capacity to absorb change is well understood. The applicant should seek to reduce the harm to archaeological remains through careful placement of buildings, services and other sub-surface intrusions. Following the completion of the desk-based and setting assessment as outlined above, and a programme of trial trenching, it may be necessary to amend the Master Plan to minimise harm to heritage significance.

Policy considerations

The National Planning Policy Framework (NPPF) is clear that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so they can be enjoyed for their contribution to the quality of life for existing and future generations (NPPF para 184).

The NPPF states that where a proposed development site 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 should also be carried out (NPPF para 189).

The effect of an application on the significance of a non-designated heritage asset should be considered when determining the application (NPPF para 197). 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 (NPPF para 194; footnote 63). This means that harm to the significance any non-designated archaeological assets of national importance that are present at the site should require clear and convincing justification (NPPF para 194), and great weight in planning balance should be given to their conservation (NPPF para 193).

Less than substantial harm to the significance of any such non-designated archaeological assets of national importance should be weighed against the public benefits of the proposal (NPPF para 196) and substantial harm should be wholly exceptional (NPPF para 194).

Local planning authorities are required to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset), and to take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal (NPPF para 190).





Developers should be required to record and advance understanding of the significance of any heritage assets that would be lost, in manner appropriate to their importance and impact. However, it is important to note that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted (NPPF para 199).

Para 200 of the NPPF is clear that local authorities should look for opportunities for new development within the settings of heritage assets to enhance or better reveal their significance. Proposals that preserve the elements of setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

The proposed development at the site is also subject to the overall requirements of Local Plan Policy H SP2 clause m, which requires that development “maintain and enhance any important features, characteristics and assets of the local area”. This policy applies to the military heritage of the site, including the runways and any associated surviving historic buildings or structures that are of heritage significance.

In determining this application, you should additionally bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Section 72(1) of the 1990 Act also requires you to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Historic England Position

The scheme has the potential to cause harm to both designated and undesignated heritage assets of national importance. There is also an opportunity to provide enhancement and secure heritage benefits as part of the scheme.

The proposed development site has high potential for prehistoric and Roman archaeology, which is likely to be of at least regional significance. The airfield is an important site in the development of military and civil aviation, and as such is also of at least regional significance. In addition, there are listed buildings and a conservation area in the wider landscape that may include the proposed development site in their settings.

The ES does not provide a complete and robust enough account of the historic environment to support an informed decision on the merits of the application. The significance of known heritage assets has not been demonstrated adequately.





The screening process used for setting assessment has not been explained sufficiently, and certain designated assets that we expect to be assessed have not been addressed. These issues are due to the incomplete nature of the data provided, and the applicant can address these deficiencies with further work and reporting.

The impact of the proposals on buried archaeological remains, the aviation heritage of the airfield and the settings of built heritage in the wider landscape are not explained to a sufficient degree of confidence in the ES or its supporting DBA and geophysical survey report. Trial trenching has not yet been carried out to determine the significance of archaeological remains indicated by geophysical survey, or to identify remains that are not identifiable by that survey.

Sufficiently identifying the significance of assets, and using this to evolve the Masterplan and Environmental Statement, will be critical to providing a strong basis for design decisions. This is particularly relevant in light of the NPPF (para. 189) requiring an applicant to describe the significance of any assets affected, and (paras.184 and 193) to conserve heritage assets in a manner appropriate to their significance.

We think there must be a particular focus on using robust approaches to analysis of significance and impacts to heritage assets, and expect to see the development Masterplan actively respond to historic environment concerns. This is because it is an objective of sustainable development to protect and enhance the historic environment as outlined in the NPPF (paras. 8 and 200).

It is vital that impacts to the historic environment are also sufficiently identified. Where there is harm to the significance of heritage assets we note the requirement to avoid or minimise any conflict between the heritage assets conservation and any aspect of the proposal (NPPF para. 190), and to have clear and convincing justification for any harm (para. 194). This is particularly essential in regard to designated heritage assets or those of equal significance.

A Master Plan for the development should therefore 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, can only be achieved with the benefit of a good understanding of heritage significance.

Next Steps

The following key actions should be undertaken to advance the application in a way that ensures that the decision-making process is properly informed, minimises harm to the historic environment, and enhances the historic environment where possible:

1. The significance of each heritage asset in the study area should be assessed and reported in the form of a gazetteer;
2. Adequate reasons should be given where designated heritage assets are not





- assessed for setting-related impacts;
3. Those assets for which further setting assessment would be appropriate should be subject to it, in accordance with Historic England's guidance;
 4. The historic landscape character and the significance of the airfield within its national context should be investigated and included in the impact assessment
 5. A programme of trial trenching should be agreed and carried out to test the results of the geophysical survey and to confirm the extent, character and significance of the buried archaeological remains

Once the work described above has been carried out, the Masterplan should be reconsidered, to identify ways in which careful design could improve the outcome for the historic environment. Design solutions should be sought to minimise truncation of significant buried archaeological remains (for example by including important remains in areas of public open space), harmful alteration to the settings of built heritage, and harmful loss of the airfield's historic character.

Recommendation

Historic England do not object to this application in principle, but advise that additional work is required to provide adequate supporting information and justification for the development Masterplan.

We are not satisfied that the scope and quality of the historic environment assessment is sufficiently robust to inform the decision-making process.

We consider that the application does not meet the requirements of the NPPF but in particular paragraph numbers 184, 189 and 200. In addition, we consider that the application does not meet the requirements of the Local Plan Policy H SP2 clause m.

Given the potential importance of the heritage assets within the area, we encourage you to seek improvements to the supporting documentation, and the overall approach taken.

While Historic England would anticipate complementing and not duplicating the advice of your heritage advisors, we would be pleased to discuss the points we have made in this letter, and can provide further advice about the issues raised, if requested, in due course.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely,





Historic England

Rebecca Lambert
Inspector of Ancient Monuments



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