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FORD AIRFIELD
Application No. F/4/20/OUT

Response to Historic England Consultation comment dated 14th January 2021

Historic England in their consultation response to the planning application has raised three issues. These are:

Impact on buried archaeological remains

Historic England comment that they do not believe that adequate information has been submitted in order to assess the potential impact on below ground non-designated archaeological heritage assets. The application was supported by a comprehensive archaeological desk-based assessment which had been submitted to Arun District Council's archaeological advisor, Mr James Kenny, when Orion engaged in early consultations ahead of preparing the planning application and ES. Mr Kenny raised no concerns relating to the quality or conclusions of the desk-based assessment.

Following these consultations, an extensive geophysical survey of the site was undertaken which revealed a number of anomalies of definite, probable and possible archaeological origin, including remains of probable prehistoric or Roman in date as well as buried former airfield features. The report was submitted to Arun District Council's archaeological advisor ahead of the planning application and ES being submitted to discuss the need and scope of any archaeological evaluation trenching works. Mr Kenny confirmed that in his professional opinion there was adequate information for him to advise on the potential archaeological impact of the proposed development and that all further archaeological works were appropriate to be undertaken as a condition of outline planning permission.

Historic England's comments on the archaeological assessment presented in the ES is at odds with the Council's own archaeological advisor. In his consultation response to the planning application dated 15th February 2021 Mr Kenny stated:

"As is stated in the archaeology and built heritage chapter of the environmental statement, the below-ground archaeological interest that this site has been shown to contain and to have the potential to contain should be further evaluated by trial trenching in order to identify anything of importance whose significance should be properly preserved from the effects of development. It is likely that the latter should be achieved through further field investigation, analysis and publication of the results. Where built structures of archaeological interest survive, for example associated with military occupation of the site, these too should be evaluated and suitable recording allowed for."



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The methodologies for the further evaluation by trial trenching and of built structures should be detailed in a written scheme of investigation which should be formally agreed beforehand. It should also include commitments to the mitigation of impact through further investigation, recording and publication, and to appropriate involvement of the general public, both in the field where possible and through dissemination of the results.

This process would be best secured via the imposition of a suitable standard archaeology condition.”

Historic England also comment that the desk-based assessment does not have a gazeteer of all the HER records within the study area. While this is correct, the inclusion of a gazeteer is not required by the ClfA Standards & Guidance for Historic Environment Desk-Based Assessments (2017). The HER records are all fully referenced in the text of the report within the relevant time periods that the records refer to. The location of all the records are shown on Figure 2 of the assessment. An inclusion of a gazeteer to the report would not change the assessment conclusions as all of the HER and designated heritage asset records have been fully taken into account in the desk-based assessment and also in chapter 8 of the ES.

Historic England describe the comment in chapter 8 that the archaeological investigations that will be undertaken ahead of the construction of the proposed development will have a mildly beneficial effect, as being highly unorthodox. The geophysical survey of the site that was undertaken as part of the archaeological assessment has located previously unrecorded prehistoric/Roman remains. The investigation of these remains through the proposed mitigation strategy will increase the understanding of the occupation of both the development site and the wider Sussex coastal plain. Consequently, there will be a beneficial effect. However, this is a side effect of the mitigation and is not included in chapter 8 in an attempt to discount the effect on non-designated archaeological heritage assets.

Designated heritage assets surrounding the site

Historic England raise concerns regarding the potential impact on designated heritage assets within the wider area of the proposed development both in relation to the submitted scoping report as well as in relation to the submitted planning application. As outlined in paragraph 8.21 of chapter 8 of the ES, all designated heritage assets within 1km radius of the application were considered in the assessment. Contrary to Historic England’s comments, the presence of designated assets has been taken into account in the design of the masterplan. This assessment took into account both the issue of intervisibility and co-visibility as well as the other factors that comprise the setting such as historic association, noise, smell and other non-visual factors. The assessment was undertaken in full compliance of The Setting of Heritage Assets: Historic Environment Good Practice Advice Planning Note 3 (2017).

The assessment established that the proposed development lies beyond the setting of designated heritage assets in Yapton, Climping and Ford. This conclusion was based on the lack of intervisibility and lack of former historic associations between these designated assets and the application site. Consequently, the assessment concludes that there will be no impact on these designated heritage assets as the proposed development will not have an adverse effect on their significance. Historic England make a comment about the submitted ZTV which indicates that most of these heritage assets are intervisible with the application site. However, the ZTV is a bare earth model and so does not take into account existing buildings & structures or vegetation. The assessment presented on chapter 8 of the ES is based on extensive site survey as well as detailed documentary and desk-based research.

Historic England make a comment regarding the ES's conclusion that there will be a negligible effect on the significance of Athrington House. They state that the assessment of the effect of the proposed development being negligible does not alter the need for the decision maker to apply great weight to any harm that arises from the scheme. Where a proposed development results in less than substantial harm to the significance of a designated heritage assets, the NPPF, PPG and case law do indeed require the decision maker to give this effect great weight as per para 193 of the NPPF. However, in respect to Athrington House, the proposed development will have a negligible effect on the significance of the listed building as the field within the red line area that is closest to the house will change from an arable field to open space on the edge of the development. While this is a change at the periphery of the setting of the house, it is not a change that will have a harmful effect on the significance of the house, hence the conclusion of a negligible effect. As outlined in table 8.1, a negligible effect on the setting of a designated heritage assets is one that is very minor change to a heritage asset's setting such that there is a slight impact not materially affecting the heritage asset's significance. That is, there is no adverse effect on the significance of the listed building. Consequently, there is no harmful affect for the decision-maker to have to add great weight to and paragraph 196 of the NPPF is not engaged.

Aviation Heritage

Historic England raise concerns regarding the effect on the former airfield structures and the historic landscape of the former airfield. The airfield has been fully considered in the desk-based assessment and in chapter 8 of the ES. The history of the airfield that Historic England described in their letter is correct and Orion would not dispute any of it. As outlined by Historic England, the key surviving elements of the airfield are the concrete runways within and beyond the application site. The level of survival of the runways is unusual but is not unique, especially as the airfield was used until relatively recently, unlike many other WWI and WWII airfields that went out of use shortly after either or both wars.

Both the geophysical survey and crop marks visible on aerial photographs (as can be seen on Google Earth) have recorded below ground archaeological remains of the former airfield. However, while these form part of the airfield, they have no presence on the ground and so their contribution to the significance of the airfield is their evidential value rather than as a perceptible element of the existing landscape.

The desk-based assessment and chapter 8 of the ES assess the significance of the airfield remains as being of local significance which in terms of the ES assessment criteria equate to low sensitivity. It is accepted that the surviving and below ground airfield features within application site could potentially be considered as being of regional significance (i.e. medium sensitivity in chapter 8 table 8.2). There is no suggestion that the remains are of national significance which, if was the case, would place them as being of demonstrable equivalence to a listed building or a scheduled monument.

The proposed development entails the removal of the section of the western arm of the runway that is within the red line area, as well the below ground features that are within the developable area of the proposed development. There is a section of the western arm of the runway still surviving to the west of the red line area. The N-S runway that falls within the red line area will be retained as it is and the rest of the surviving runways are to the east and outside of the red line area and so will not be impacted. The loss of the part of the western runway within the development area will be a medium magnitude of change as per Table 8.1 of chapter 8 of the ES. That is, there will be a partial loss or alteration of the significance of a heritage asset.

Chapter 8 paragraph 8.49 concludes that the impact on the runway as being moderate adverse. If the airfield is considered as being of potential regional significance (i.e. medium sensitivity in Table 8.2), utilising the matrix of determining significance of effect (Table 8.3), the assessment of the significance of impact on the airfield remains would be moderate adverse. Consequently, the assessment of impact in chapter 8 would remain the same.

The line of the runway will be retained as open space through the proposed residential area, so while the concrete runway will be removed, its former line will be preserved as a positive feature within the masterplan. Interpretative material, such as display boards and a heritage themed walk, can be provided as part of the scheme so to as inform the new community and visitors as to the history of the airfield as well as the results of the archaeological investigations of the prehistoric and Roman remains. This could be secured through use of an appropriately worded condition.

Conclusion

In conclusion, we consider than all designated and non-designated heritage assets have been suitably considered and assessed in accordance with NPPF Section 16, the historic environment section of the PPG, the Setting of Heritage Assets Good Practice Guide Note 3, and the heritage policies of the Adopted Arun Local Plan 2011-2031. The assessment concluded that there would be no harm to the significance of all designated heritage assets within 1km radius of the application site. It concluded that the site contains non-designated archaeological remains on local significance and these remains are likely to be impacted by the proposed development. It has been agreed with the Council's archaeological advisor that the mitigation strategy proposed in chapter 8 of the ES is appropriate and can be secured by condition to the granting of outline planning consent. It also concludes that part of the non-designated former airfield structures will be adversely affected. The mitigation strategy will include the recording of the runway prior to its removal and also the recording of other airfield related features revealed by the proposed evaluation trenching of the site. A programme of public outreach through the provision of suitable interpretive materials for the new community will also be provided and can be secured by a suitably worded condition.