WEST SUSSEX COUNTY COUNCIL **DATE: 21/9/2010**
INFRASTRUCTURE CONSULTATION

FROM: **Liam Riddy** **TO: Arun District Council**
FAO: Jay Singh

SUBJECT: **P/91/10**

Church Farm Holiday Village, Church Lane, Pagham

New building adjacent to central reception building

CONSULTATION DATE: 31/8/2010

RECOMMENDATION:

Advice		**Modification**		**More Information**	
Objection		**No Objection**		**Refusal**	X

S106 contribution: £ N/A

The Highway aspect of this application has been dealt with in accordance with the Development Control Scheme protocol for small scale proposals which include up to 5 residential units or extensions to single units accessed from roads that do not form part of the Strategic Road Network (SRN). As such the comments provided by Local Development should be considered to be advice only, with respect to this planning application.

WSCC considers issues of highway safety, capacity, archaeology and conservation architecture regarding this application. WSCC recommends **refusal** based on the archaeological comments provided.

Highways

West Sussex County Council was consulted previously on Highway Matters for this location under planning application no. P/106/09 which no highway objections were raised.

This proposal has been considered by means of a desktop study, using the information and plans submitted with this application, in conjunction with other available WSCC map information. A site visit can be arranged on request.

No apparent impact on highway safety.

Archaeology

Summary and Recommendations

The application site is located within a designated nationally important archaeological site, a Scheduled Ancient Monument, of which the nearby Grade II Listed Beckett's Barn is a part.

English Heritage may wish to comment upon this application, as a statutory consultee in respect of planning proposals affecting such Monuments. The applicant will also need to make an application to the Secretary of State (Culture, Media and Sport), who is advised in such matters by English Heritage, for formal legal Scheduled Monument Consent for the proposals.

At present no Heritage Statement has been submitted in support of this application. No information has been submitted concerning the known archaeology of the site, the

archaeological impact of the proposals upon buried archaeological remains, and their impact upon the setting of the Scheduled Barn and the remainder of the Monument.

Without the above documentation, the local planning authority will not have sufficient information to determine this application in a fully informed manner, and the application should be **refused.**

The applicant's agents are presently discussing these concerns with Arun District Council and the County Council, and are understood to be addressing the absence of the relevant information.

Policies : PPS5, *Planning for the Historic Environment*, Policies HE6, HE7, HE9, HE10; 2003 Arun District Local Plan, Saved Policy AREA16 (Ancient Monuments and Sites of National Archaeological Importance).

Detailed comments

The site of the proposed new building is located within a designated nationally important archaeological site : Scheduled Ancient Monument, West Sussex County No. 219.

The applicant will need to apply to the Secretary of State (Culture, Media & Sport) for formal legal Scheduled Monument Consent for the proposals (Ancient Monuments & Archaeological Areas Act 1979, as amended 1983); without such Consent, the building cannot legally be erected. This Consent procedure is separate from, and independent of the land use planning process: English Heritage, who are being consulted by the local planning Authority on this planning application, advise the Secretary of State in respect of Consent applications.

The Scheduling of the Monument, which has not been revised for many years, is presently considered to cover both the open area within which the present Reception buildings are located, the application site, all below ground archaeological remains, and all above ground buildings and other structures within the Scheduled area, including the Grade II Listed Beckett's Barn existing Owners' Reception building.

Beckett's Barn itself was originally an early 13th-century house, one of the main buildings of the Rectory of Pagham, which belonged to the Archbishop of Canterbury. Before the 1970s, when a layer of clay was deposited over the open area to the south of the Barn. Previous archaeological excavations under, and to the north and south of the Barn, in the 1950s, 1970s and 1990s have shown a number of periods of ancient occupation, from the Iron Age, Roman and Middle Saxon periods, pre-dating the construction of the Barn itself.

The footprint of the proposed new building would be situated to the south-east of the smaller Reception building, erected in the early 1990s. Under the 1990s building, a thick layer of clay was recorded by Archaeology South-East, during exploratory investigation in 1993, a layer deposited over all of the relatively open area around the Barn in the 1970s. Below the clay, and close to or within the proposed building footprint, there was still existing in 1786 a dovecote. The dovecote may have been medieval in origin, and its foundations may survive below the clay layer. Also within the proposed building footprint, and below the clay, should still survive earthworks thought to be those of medieval fishponds.

In the Government's recently issued planning guidance, PPS5, *Planning for the Historic Environment*, Policies HE6, HE7, HE9 and HE10 make it clear that local planning authorities should have been provided with sufficient information on the impact of a planning proposal upon a heritage asset and its setting, (such as this archaeological site and medieval building), on the heritage asset's significance, and on proposals for mitigation of the archaeological impact, before they can determine a planning application. The local planning authority will need to be satisfied that there would be no substantial harm to or loss of the designated heritage asset, or that the proposals would carry a substantial public benefit, overriding that harm or loss, before approving the application (PPS5 Policy HE9).

Particularly upon a designated site of national archaeological importance, like the application area, that information should be submitted by the applicant with the planning application. In this case, such information should include reliable information, from desk-based information and exploratory archaeological investigation, upon (i) the direct impact of the proposals upon buried archaeological remains, such as the medieval earthworks and dovecote, and (ii) the impact of the proposals upon the setting of the medieval Beckett's Barn and upon the Scheduled area as a whole (PPS5 Policies HE10.1, 10.2).

At present the documentation submitted with the current application does not include a Heritage Statement, information concerning the Scheduled Ancient Monument, or information upon the archaeological impact of the proposals. Without this information, the application should be refused.

In very recent informal discussion with Arun District Council and the County Council, following submission of the application, the applicant's agents have been apprised of these archaeological concerns.

Conservation Architecture

The architectural form of this proposal represents an interpretation of an historic barn. It has a significant scale which does not positively contribute to the setting of the important historic building.

In its own right, however, the style of the new building is visually pleasing. Covering the external walls in oak feathered edge boarding would make the design more visually representative of a Sussex Barn, and therefore of a lesser impact in this location. Furthermore, the form of the prominent roof could be addressed by a different design of the patent glazing.

Liam Riddy
Local Development