

WWII INFANTRY SECTION POST RETENTION STRATEGY

Condition 34, Land North of Sefter Road, P/134/16/OUT

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WWII Infantry Section Post
Retention Strategy
4
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Quality Management

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1 INTRODUCTION & BACKGROUND

- 1.1 This WWII Infantry Section Post Retention Strategy comprises a statement to discharge condition 34 and has been prepared by RPS with respect of Land North of Sefter Road, Pagham, Bognor Regis (hereafter referred to as "the Site").
- 1.2 Outline planning approval has been granted by Arun District Council for residential development of the Site (P/134/16/OUT). Condition 34 of that approval requires the retention and interpretation of a World War II Infantry Section Post. This report has been prepared to address the requirement of Condition 34 and demonstrate how this programme of conservation and interpretation can be secured.
- 1.3 Condition 34 states that:

"Prior to the commencement of development, a statement shall be submitted which will provide details of how the WW2 Infantry Section Post will be retained on site and integrated as part of the proposals. The development shall be carried out in accordance with the approved statement, unless otherwise agreed in writing by the Local Planning Authority."

Reason: To preserve the significance of the non-designated heritage asset in accordance with Policy HER SP1 of the Arun Local Plan and paragraph 197 of the National Planning Policy Framework and to ensure that historic building feature is protected and preserved. It is necessary for this condition to be pre-commencement to avoid any harm to the significance of the non-designated heritage asset."
- 1.4 This report has been prepared to provide the statement sufficient to discharge Condition 34 described above. This statement identifies a strategy to be agreed with the Local Planning Authority containing details of the retention and integration of the Infantry Section Post. This strategy also includes future dialogue that may be required with the Local Planning Authority following the discharge of condition as part of the longer term on-going management of the WW2 Infantry Section Post. This statement is therefore considered sufficient to discharge Condition 34.
- 1.5 This statement contains additional information regarding the future retention and conservation of the Infantry Section Post, and an overview of its significance. This report has been prepared following dialogue with Conservation Officers regarding the material required to discharge this pre-commencement condition. Broadly, this information falls into two categories.
- 1.6 The first element addressed by this report details how the design of the current reserved matters application for the Site has incorporated the Infantry Section Post into landscape and urban design strategies and detail design (reserved matters planning ref: P/49/21/RES).
- 1.7 The second element of this report details the steps that will be undertaken to ensure the retention and interpretation of the built fabric of the Infantry Section Post itself. This element also includes information relating to the further dialogue that may be required for the retention and protection of the non-designated built heritage asset. This will be informed by Historic Building recording of the Infantry Section Post. This Historic Building Recording is detailed within a Written Scheme of Investigation prepared by RPS, included as Annex 1 to this report. The results of the historic building recording will be deposited in the West Sussex Historic Environment Record and a copy passed on to the LPA. Also included within this Annex is the Cultural Heritage Desk Based Assessment prepared for the Site in support of the approved outline application (see Appendix A of Annex 1).

2 ASSESSMENT OF THE INFANTRY SECTION POST

Introduction

- 2.1 This section will provide an overview of the non-designated Infantry Section Post that is the focus of Condition 34. It provides a description of the non-designated heritage asset and its historic use, followed by an overview of its significance.

Assessment of Significance

Description & History

- 2.2 The Infantry Section Post was identified in the Cultural Heritage Desk-Based Assessment (DBA) prepared by CgMs Consulting (part of RPS), on behalf of Taylor Wimpey Strategic Land, on the development site centred at SZ 90103 99556.
- 2.3 The following extract is taken from the Cultural Heritage Desk Based Assessment prepared by CgMs Consulting in support of application ref: P/134/16/OUT in 2016 (the DBA is included as an appendix to the WSI, see Appendix A of Annex 1). It provides an overview of the Section Post.

"A WW2 Infantry Section Post (MWS7086 at SZ 8989 9958) was erected in the west of the site as part of the perimeter defences around Bognor Regis. It is an uncommon sentry structure, L-shaped and constructed of brick and concrete. It is currently well preserved but is very overgrown with vegetation (Plate 9)." (paragraph 4.6.10, CgMs, 2016)

Assessment of Significance

- 2.4 A more detailed assessment of significance will be provided within the Historic Building Recording to be undertaken. However, it is considered that the significance of the Infantry Section Post lies in its minor historic interest as a fragment of the remains of Second World War defences that may have links to the 2nd Battalion of the Bedfordshire Regiment. The structure is of some historic interest due to the age of its built fabric and its unusual L shaped plan form, but is most strongly derived from this historic use and its role in providing defences against potential invasion forces during the Second World War.

Setting & Contribution of Setting to Significance

- 2.5 The Infantry Section Post lies within an area of overgrown land to the north of Sefter Road. It lies near a field boundary, in a field enclosed by tall hedgerows and mature planting. More broadly, the Infantry Section Post lies within agricultural land to the north of Sefter Road and the residential areas of Rose Green, Bognor Regis.
- 2.6 The Cultural Heritage Desk Based Assessment concludes the following regarding the setting of the Infantry Section Post, and its potential contribution to its modest significance:

"The information available for the wider setting of the WW2 Infantry Section Post, as part of Bognor's perimeter defences, is limited. Similar to other posts and pillboxes across the southern coast, it was likely built as part of a wider anti-invasion plan, comprising static defence lines, to counter the danger of invasion after the defeat at Dunkirk in May 1940 (Saunders 1989). The 2nd battalion of the Bedfordshire Regiment are recorded as taking part in the fighting at Dunkirk, and after evacuating across the English Channel they reformed at Yeovil and then took up 'defensive positions around Bognor Regis, Sussex' for a few months before moving on to Hertfordshire (www.bedfordregiment.org.uk).

The HER record for the WW2 Infantry Section Post refers to it being near the line of a former anti-tank ditch. It is unclear if this reference bears any relation to the 'drain' that appears adjacent to the location of the post on the 1968-71 Ordnance Survey (Fig. 13). The drain is not indicated on earlier maps but it is not clear if it preceded the infantry post, which may have been built at this location in order to take advantage of the existing ditch, or if the drain was originally constructed for the purpose of forming anti-tank defences.

No other posts or pillboxes are recorded within the study area on the HER. The Defence of Great Britain Project (2006) does not hold any record for this particular infantry section post, and the nearest pillbox is recorded nearly 2km away on the south coast. No clear defence line is observable.

The Bognor Advance Landing Ground was located c. 1km northwest of the site (MWS6818 at SU 9115 0030), evidence for which was also found during the 2009 archaeological evaluation (MSW11501, Cotswolds 2009). It was an airfield and tented camp used in WW2 by the RAF. The relationship of the infantry section post to this airfield is unclear; it may have been a means of defence against a possible attack on the airfield." (paragraphs 4.6.11 - 4.6.17, CgMs, 2016)

- 2.7 It is therefore considered that, while the broader setting of the Infantry Section Post may make some contribution to its historic interest, an understanding of this contribution is limited to documentary sources only. The overgrown nature of the Infantry Section Post today, and its distance from any other remaining Infantry Section Posts or other war defences, have limited the contribution that the setting of the Infantry Section Post makes to its significance.

Response to the Infantry Section Post in Approved Scheme P/134/16/OUT

- 2.8 The Cultural Heritage Desk Based Assessment prepared by CgMs went on to conclude that:

"On the basis of the available evidence, the proposed development is considered unlikely to have a significant or widespread archaeological impact across the majority of the site. However, it has the potential to have a severe but localised negative impact on the WW2 Infantry Section Post in the west of the site." (paragraph 4.8.5, CgMs, 2016)

- 2.9 Over the course of the outline application, comments from the Archaeological Advisor to Arun Council, stated:

The WW2 infantry section post, which should be considered to be a non-designated heritage asset, is of at least local significance. It seems that it is 'to be removed prior to development' despite being 'within P/134/16/OUT REPORT_804(ODB) an area not intended for residential development but to be retained as a natural green space, with a road crossing through it.' In the circumstances its demolition should only be considered if its loss is outweighed by some benefit - and it isn't clear what this might be. If demolition proves necessary a full record should be made as part of the programme of archaeological work. (pp. 11-12, Officers Report, Arun Council, 2016).

- 2.10 The above comments lead to the formulation of Condition 34 for the outline approval. In accordance with these comments, the proposed development described as part of the current reserved matters application (ref: P/49/21/RES) includes the retention of the Infantry Section Post and its incorporation into the residential development within the context of a sensitively designed landscaping scheme.

3 PROPOSED DISCHARGE OF CONDITION 34

Introduction

3.1 In order to fulfil the requirements of Condition 34, this section will describe how the proposed development described within the current reserved matters application (ref: P49/21/RES) will retain the Infantry Section Post on Site, and how it is integrated as part of the proposals. This falls into two main categories:

- A short outline of how the landscape design of the scheme will respond to the retained section post; and
- A brief overview of how the Section Post itself will be made secure. As discussed with the Conservation Officer, this is not to be a detailed technical breakdown of changes to the built fabric, but provides sufficient information to understand the approach and how the significance of the Section Post will be preserved.

Landscape Response to the Infantry Section Post

3.2 The proposed development described in the reserved matters application (ref: P/49/21/RES) will retain the Infantry Section Post in-situ. This will retain the location of the building, which makes a modest contribution to its significance. Landscaping proposals are described within the application documents submitted as part of P/49/21/RES. Those specifically focussed on the area around the Infantry Section Post include drawings CSA/2038/124-128.

3.3 The retained Infantry Section Post has been incorporated into the landscape strategy of the proposals, which have also been shaped following heritage input from RPS. The landscape strategy has been prepared to ensure the integration of the retained Infantry Section Post into the proposals in order to minimise potential impacts to its significance.

3.4 The design ensures that no built form will be constructed in close proximity to the Infantry Section Post. The Infantry Section Post is located within a proposed area of green open space, and separated from proposed buildings by considered screen planting and landscaping. This will ensure that the Infantry Section Post is experienced similarly to how it would have been previously approached, as a now isolated feature with an immediate landscape setting.

3.5 In addition, the landscaping proposals have been considered to retain elements of the setting of the Infantry Section Post that may make a minor contribution to its significance. These are elements of the setting of the Infantry Section Post that likely date from its time of construction, and would have influenced its location and orientation. This includes the remaining field boundaries and the reinstated green open space around the Infantry Section Post described above. It also includes the retention of much of the line of the potential location of the ant-tank ditch, where this has been feasible.

3.6 The proposed fencing has also been considered to respond to the Infantry Section Post. The fencing is offset from the Infantry Section Post, which is preserved in an area of green open space set within mature planting beyond. The proposed boundary is rustic post and rail fencing at 1100mm high, constructed of timber which responds to the semi-rural location of the Infantry Section Post. This fencing is visually permeable, allowing views through to the Infantry Section Post. A strategic break in the fencing has also been designed in line with the Section Post, creating an uninterrupted view through to the structure from the road which will allow for an understanding of its significance. The proposed fencing and landscaping is designed to be visually permeable and allow for an appreciation of the Infantry Section Post, while discouraging extensive public access to the non-designated built heritage asset. Additionally, the proposed road roughly follows the line of the existing track near the section post to minimise potential impact.

Strategy for the In-situ Retention of the Section Post

3.7 The Infantry Section Post will be retained in-situ. While it is the intention to preserve the Infantry Section Post, it will likely not be able to be publicly accessible for safety reasons. In order to retain the Infantry Section Post on Site, the following scheme of works is proposed:

1. Clearance of overgrown planting surrounding the Infantry Section Post

This will allow for safe access for future stages of work, and for the fabric of the Infantry Section Post to be better appreciated, better revealing its significance.

2. Level 2 Historic Building Recording

A programme of historic building recording will be undertaken for the Infantry Section Post. This is described within the Written Scheme of Investigation, included as Appendix A of this report. The Historic Building Recording will provide a written, photographic and drawn record to Level 2 standard, as per Historic England Guidance *Understanding Historic Buildings: A Guide to Good Recording Practice* (2016). It will provide comprehensive heritage assessment of the building, the site, and its setting. This will be used to inform later steps of this strategy below.

3. Formulation of Short-term strategies for retention

The previous survey of the building will inform a programme of retention for the Infantry Section Post. This will include short term programmes of work to aid the retention of the Infantry Section Post and make it safe. This may include any emergency remediation works required to stabilise the Infantry Section Post and make it structurally sound. This may also involve sensitive, carefully considered interventions to ensure the Infantry Section Post is safely secured from any intrusive public access. No physical works will be undertaken to the Infantry Section Post without consultation with the Local Planning Authority on the nature of these works beforehand.

4. Long-term strategies for retention and interpretation

Following the Historic Building recording and the building having been made safe as described above, it will be possible to formulate long term strategies for the retention and interpretation of the Infantry Section Post. As discussed above, by this time the setting of the Infantry Section Post will also be preserved through the forthcoming proposed landscaping schemes. Long term strategies for the retention and interpretation of the Infantry Section Post may include the installation of interpretation boards. These retention and interpretation measures will be discussed with the Local Planning Authority before their implementation.

4 CONCLUSION

- 4.1 This WWII Infantry Section Post Retention Strategy has been prepared to provide additional information to discharge Condition 34 related to outline consent for the development of Land North of Seftor Road, Pagham, Bognor Regis (ref: P/134/16/OUT).
- 4.2 Condition 34 states that *"Prior to the commencement of development, a statement shall be submitted which will provide details of how the WW2 Infantry Section Post will be retained on site and integrated as part of the proposals."*
- 4.3 This report has provided a statement of how the Infantry Section Post will be retained on Site and integrated into part of the forthcoming proposed development. This broadly falls into two categories: the landscape treatment of the forthcoming proposals and the proposed treatment of the fabric of the Infantry Section Post itself.
- 4.4 The forthcoming proposed development includes a strategy that integrates the retained Infantry Section Post into a landscaped area within the proposed development. This includes clearing the dense overgrowth from around the section post and preserving it in landscaped open space. The proposals also retain the limited elements of the setting of the Infantry Section Post that may contribute to its significance.
- 4.5 Additionally, this report contains a strategy for the retention and preservation of the built fabric of the Infantry Section Post. This includes undertaking a Level 2 Historic Building recording on the structure, will be used to inform plans for its future retention and interpretation.
- 4.6 It is therefore considered that the information within this report is sufficient to discharge Condition 34 of application P/134/16/OUT.

APPENDICES

Annex 1

Written Scheme of Investigation (Level II recording) to Inform a Programme of Retention and Interpretation

WRITTEN SCHEME OF INVESTIGATION (LEVEL II RECORDING) TO INFORM A PROGRAMME OF RETENTION AND INTERPRETATION

Sefter Road Infantry Post, Pagham, Bognor Regis, West Sussex

JAC 25445
Sefter Road Infantry Post,
Pagham, Bognor Regis
3
May 2021

WRITTEN SCHEME OF INVESTIGATION (LEVEL II RECORDING) TO INFORM A PROGRAMME OF RETENTION AND INTERPRETATION

Quality Management

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Figure 2 Summary of cultural heritage designations (data from West Sussex HER)

Plates

Plate 1 General view showing heavy undergrowth over Infantry Section Post

Plate 2 Entranceway

Plate 3 Heavy undergrowth around entranceway

Plate 4 Interior

1 INTRODUCTION AND SCOPE OF STUDY

Introduction

- 1.1 Outline planning consent has been given by Arun District Council for residential development of land north of Sefter Road, Pagham, Bognor Regis (P/134/16/OUT). A condition of that consent required a programme of retention and interpretation of a World War II Infantry Section post.

34 Prior to the commencement of development, a statement shall be submitted which will provide details of how the WW2 Infantry Section Post will be retained on site and integrated as part of the proposals. The development shall be carried out in accordance with the approved statement, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To preserve the significance of the non-designated heritage asset in accordance with Policy HER SP1 of the Arun Local Plan and paragraph 197 of the National Planning Policy Framework and to ensure that historic building feature is protected and preserved. It is necessary for this condition to be pre-commencement to avoid any harm to the significance of the nondesignated heritage asset.

- 1.2 This Written Scheme of Investigation provides a method statement setting out how a 'Level II' record will be made of the Infantry Post (MWS7086 at SZ 8989 9958). It has been prepared to be read alongside the *WWII Infantry Section Post Retention Strategy* prepared by RPS to discharge Condition 34 (April 2021). The Level II record is designed to inform a programme of retention and interpretation, as discussed within the above statement. However, the structure is currently heavily overgrown by undergrowth, and is largely inaccessible. It follows therefore that the precise nature of the retention and interpretation cannot be set until access to the Infantry Section Post subsequent building recording is carried out. However, the Infantry Section Post is to be retained on Site, in-situ, within a carefully considered landscape setting as part of forthcoming proposals. The strategy for its retention and interpretation is described in the *WWII Infantry Section Post Retention Strategy* prepared by RPS (April 2021). Therefore this WSI forms part details pursuant to the discharge of condition 34, and with the aforementioned *WWII Infantry Section Post Retention Strategy*, is sufficient to discharge the condition.

Scope of Study

- 1.3 The Infantry Post was been identified in the Cultural Heritage Desk-Based Assessment (DBA) prepared by Ashley Bryant of CgMs Consulting (part of RPS)¹ on behalf of Taylor Wimpey Strategic Land on the development site centred at SZ 90103 99556.

The DBA recorded that *"The World War 2 Infantry Section Post (MWS7086 at SZ 8989 9958) was erected in the west of the development site as part of the perimeter defences around Bognor*

¹ CgMs 2016 Cultural Heritage Desk-Based Assessment, Land North of Sefter Road, Pagham, Bognor Regis, West Sussex, Bryant A, CgMs Report JAC 22518, London

Regis. It is an uncommon sentry structure, L-shaped and constructed of brick and concrete. It is currently well preserved but is very overgrown with vegetation.

The information available for the wider setting of the WW2 Infantry Section Post, as part of Bognor's perimeter defences, is limited. Similar to other posts and pillboxes across the southern coast, it was almost certainly built as part of a wider anti-invasion plan, comprising static defence lines, to counter the danger of invasion after the defeat at Dunkirk in May 1940 (Saunders 1989). The 2nd battalion of the Bedfordshire Regiment are recorded as taking part in the fighting at Dunkirk, and after evacuating across the English Channel they reformed at Yeovil and then took up 'defensive positions around Bognor Regis, Sussex' for a few months before moving on to Hertfordshire (www.bedfordregiment.org.uk).

The HER record for the WW2 Infantry Section Post refers to it being near the line of a former anti-tank ditch. It is unclear if this reference bears any relation to the 'drain' that appears adjacent to the location of the post on the 1968-71 Ordnance Survey. The drain is not indicated on earlier maps but it is not clear if it preceded the infantry post, which may have been built at this location in order to take advantage of the existing ditch, or if the drain was originally constructed for the purpose of forming anti-tank defences.

No other posts or pillboxes are recorded within the study area on the HER. The Defence of Great Britain Project (2006) does not hold any record for this particular infantry section post, and the nearest pillbox is recorded nearly 2km away on the south coast. No clear defence line is observable.

- 1.4 This Written Scheme of Investigation (WSI) sets out how a programme of photographic and documentary recording will be undertaken to provide an account of the date, development and significance of the existing building, and its setting and to provide information to inform the retention and interpretation of the building.

2 RECORDING LEVELS

- 2.1 The standard recording levels recommended by Historic England are based on those first formulated by the former Royal Commission on Historical Monuments (England) in the 1980's. A Level 2 Survey is described as:

a descriptive record, made in similar circumstances to Level 1 but when more information is needed. It may be made of a building which is judged not to require a more detailed record, or it may serve to gather data for a wider project. Both the exterior and interior of the building will be seen, described and photographed. The examination of the building will produce an analysis of its development and use and the record will include the conclusions reached, but it will not discuss in detail the evidence on which this analysis is based. A plan and sometimes other drawings may be made but the drawn record will normally not be comprehensive and may be tailored to the scope of a wider project.²

- 2.2 A Level 3 record introduces a greater degree of analysis and discussion, it is:

'an analytical record, and will comprise an introductory description followed by a systematic account of the building's origins, development and use. The record will include an account of the evidence on which the analysis has been based, allowing the validity of the record to be re-examined in detail. It will also include all drawn and photographic records that may be required to illustrate the building's appearance and structure and to support an historical analysis'.

² Historic England, 2016, Understanding Historic Buildings: A Guide to Good Recording Practice, 5.2.1

3 AIMS & OBJECTIVES

- 3.1 The primary aim of the study is to meet the requirements of the planning condition 34 outlined above. It is to provide an appropriately detailed record and understanding of the building to inform a programme of retention and interpretation.
- 3.2 The latest guidelines for such recording and analysis are set out in the Historic England publication *Understanding Historic Buildings: A Guide to Good Recording Practice* of 2016 – the latest iteration of guidelines dating back to the RCHM(E) publication of 1990. These outline the most appropriate recording techniques and the detail and depth required, based on the significance of the building, its structural complexity, and the proposals for change.
- 3.3 Based on that advice, the basic level of the archaeological analysis and recording will be equal to that of an Historic England Level 2 survey, suitably enhanced and adapted to the requirements of the site with an appropriate degree of description, photography and use of annotated survey drawings.

4 THE PRINCIPAL WORKS

The Heritage Assessment

- 4.1 The main element of the work is a comprehensive heritage assessment of the building, the site, and its setting. This will include an appropriate level of documentary research and a detailed architectural and archaeological assessment of the building – sufficient to understand its original design, layout, and function and any significant changes to it. This element is based on the original Desk Based Assessment by CgMs³ but will draw on published and readily available archive sources as appropriate.⁴
- 4.2 This will use readily available documentary sources in local archives, the HER, existing detailed plans where available - suitably annotated if necessary - and a detailed photographic record. The work will result in an illustrated report on the building and an archive including copies of original plans where available, and the digital photographic survey.

Specifications

- 4.3 The basic level of the archaeological analysis will be equal to that of an English Heritage Level 2 survey, suitably enhanced and adapted to the requirements of the site with a high degree of description, photography and use of annotated existing survey drawings.

Documentary Research

- 4.4 An appropriate degree of documentary research will be undertaken to place the building in its national and regional context. This will include a brief introduction to the area and the history of the development of the site. Map regression and any readily available documentary sources related to the building will be studied and used in the production of the report to place it in its historical context.

Building Analysis & Heritage Assessment

- 4.5 As far as practicable each element of the building will be described and discussed in outline prior to an overall assessment of its development and its significance in local, regional and national contexts as well as its heritage value.
- 4.6 The work will include an overall description of the building and an appropriately detailed photographic survey with an appropriate detail of additional description of any significant decor, fixtures, fittings or historic surviving plan form.

³ CgMs 2016 Cultural Heritage Desk-Based Assessment, Land North of Seffer Road, Pagham, Bognor Regis, West Sussex, Bryant A, CgMs Report JAC 22518, London

⁴ English Heritage 2000 Twentieth Century Military Sites, London: EH; Lowry B 1996 20th Century Defences in Britain An Introductory Guide. Handbook of the defence of Britain Project, York: Council for British Archaeology; Saunders I J 2005 Pillboxes. Images of an Unfought Battle, Lulu Publications

Survey Plans

- 4.7 The building analysis will be supported by survey plans, annotated as necessary and checked for detail. Copies of the plans will be used, as appropriate, to illustrate the construction of the building and any use patterns within.

Photography

- 4.8 The written study will be accompanied by a photographic survey. This will include general views to place the building into context, three-quarter external views (perpendicular where possible) of all individual elements, and internal views to show key features of the building. The photography will be undertaken on digital (12mp) DSLRs and scales will be used as appropriate.

The Historic Assessment Report

- 4.9 The main report will be produced as a stand-alone report. Such a report can be produced as a wire-bound A4 copy and digitally as a pdf, provided on a DVD. The initial report will incorporate all the information derived from the documentary research; the analysis and recording of the fabric and plan form of the buildings; and selected photographs. The basic format will be:
- A brief overview of the history of the site, location, etc.
 - An architectural and archaeological description of the building, concentrating on constructional materials, methods of construction, structural development and change, fixtures and fittings, plan forms, etc.

Archive

- 4.10 The nature of the proposed works mean that the archive produced will be essentially digital, consisting of the report and embedded photographs in pdf format – though backed up by hard copies of the report and an archival DVD of the whole photographic survey if requested. Due to the nature of the work it will be deposited with ADSEasy. The report will be presented to the West Sussex Archaeological Advisory Service for approval prior to deposition. The relevant OASIS form will also be completed and the archive deposited will adhere to the West Sussex "Procedure for the Deposition of Archaeological Archives Version 5, March 2016". The final results of the historic building recording will be deposited in the West Sussex Historic Environment Record and a copy passed on to the LPA.

Staffing & Experience

- 4.11 RPS is a registered organisation (RAO) with the Chartered Institute for Archaeologists (CIfA). It provides specialist consultancy advice to clients in the combined disciplines of planning and development, archaeology, historic buildings, conservation and associated environmental consultancy issues. The archaeology team are the leading providers of independent advice to land-owners and developers. Free of links to local authority departments and field units, our professional approach and extensive contacts ensure that clients' interests are dealt with effectively and a balance between the often-conflicting demands of profitable development and conservation is achieved.
- 4.12 All sub-contracted specialists employed by RPS are Registered Organisations (RAOs) and established and well respected in their fields of expertise, with a proven track record of providing quality services within set deadlines. Pro forma contracts are used to ensure work is correctly specified and delivered to time and budget. RPS continually reviews the quality of work received

from sub-contractors and seeks competitive quotes in order to avoid over-reliance on a single supplier.

Timetable

- 4.13 The site work and reporting will be completed in four weeks following the initial site visit. Full archive to be deposited within 6 months of the completion of field work.

Copyright

- 4.14 Copyright of the reports and information gathered will be transferred to the client and is transferable to any new owners or developers of the site as the client sees fit; intellectual copyright remains with the consultancy.

Health & Safety

- 4.15 RPS is cognisant of its responsibilities regarding health and safety issues and carries public and professional liability insurance. All PPE will be available and used as necessary and the Consultancy is also aware of the proximity of the Pagham Rife, a watercourse, approximately 900m west of the site. A drain crosses the site close to the location of the infantry post.

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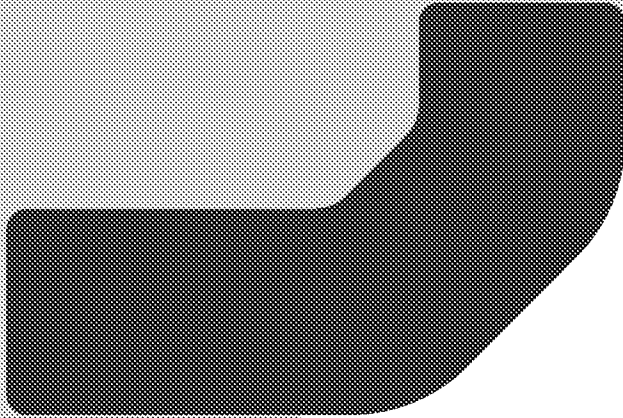
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APPENDICES



Appendix A

Archaeological Desk Based Assessment



CULTURAL HERITAGE DESK-BASED ASSESSMENT

**LAND NORTH OF SEFTER
ROAD
PAGHAM
BOGNOR REGIS**

December 2016

Planning • Heritage

Specialist & Independent Advisors to the Property Industry

**Local Planning Authority:
Arun District Council**

**Site centred at:
SZ 90103 99556**

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December 2016**

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EXECUTIVE SUMMARY

Land north of Sefter Road, Pagham, Bognor Regis is proposed for development and has been reviewed for its heritage potential and possible impacts on above ground (listed buildings) and below ground (archaeology) heritage assets.

The site is thought to have a low archaeological potential for the Prehistoric, Roman, Anglo-Saxon and Medieval periods and a low/negligible archaeological potential for the Post Medieval period. The site has a high archaeological potential for the Modern period based on the presence of a WW2 Infantry Section Post in the west of the site.

The site does not lie within a Conservation Area or an Archaeological Notification Area.

It is concluded that the proposed development will have no impact on the settings of the majority of the designated heritage assets (DHA) within a 1.5 km buffer of the site boundary.

The proposed development could potentially have a minor/negligible impact on the settings of two listed buildings at 92, 96 and 98 Rose Green Road, within a 1.5 km buffer of the site boundary. However, mitigation comprising tree and hedge planting would eliminate these impacts.

It is stated within Historic England's guidance on 'The Setting of Heritage Assets' that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals.

Although no pre-Modern archaeological assets are known on the site, due to a lack of previous development on the site and archaeological investigation in the area, the archaeological advisors for the local planning authority may take a precautionary approach and request further archaeological investigation to establish the archaeological potential of the site.

On the basis of the available evidence, it is considered that any further archaeological mitigation measures deemed necessary could be secured by an archaeological planning condition attached to any planning consent.

Future plant screening at the site to protect the setting of built heritage assets, and full building recording of the WW2 Infantry Section Post located in the west of the site, is recommended, and could also be a condition to any planning consent.

1.0 INTRODUCTION AND SCOPE OF STUDY

- 1.1 This Cultural Heritage Desk-Based Assessment has been prepared by Ashley Bryant of CgMs Consulting on behalf of Taylor Wimpey Strategic Land.
- 1.2 The assessment considers the potential impacts on archaeology (below ground heritage assets) and listed buildings (above ground heritage assets) by proposed development on land north of Sefter Road, Pagham, Bognor Regis. The site is centred at SZ 90103 99556 (Figure 1).
- 1.3 Due to the proximity of listed buildings on Rose Green Road to the proposed development, Arun District Council has advised the need for an assessment of any impact on their setting. Accordingly, Taylor Wimpey Strategic Land has commissioned CgMs Consulting to establish the cultural heritage significance of the site, and to provide guidance on ways to accommodate any constraints identified.
- 1.4 In accordance with central, regional and local government policy and guidance on archaeology and planning, and in accordance with the 'Standard and Guidance for Archaeological Desk-Based Assessments' (Chartered Institute for Archaeologists 1999, revised 2011), this assessment draws together the available archaeological, topographic and land-use information in order to clarify the archaeological potential of the site.
- 1.5 The assessment comprises an examination of evidence in the West Sussex Historic Environment Record (EHER), considers the results of nearby archaeological investigations, incorporates published and unpublished material and charts historic land-use through a map regression exercise.
- 1.6 As a result, the assessment enables relevant parties to assess the archaeological and heritage potential of the site and to consider the need for design, civil engineering, and/or archaeological solutions to the potential identified.

2.0 STATUTORY AND PLANNING POLICY FRAMEWORK

2.1 Statutory Framework

2.1.1 Legislation regarding archaeology, including scheduled monuments, is contained in the Ancient Monuments and Archaeological Areas Act 1979, amended by the National Heritage Act 1983 and 2002.

Planning (Listed Building and Conservation Areas) Act, 1990

2.1.2 The Planning (Listed Building and Conservation Areas) Act 1990 sets out policies relevant to the protection of listed buildings and conservation areas and their setting. The following policies are relevant to the site:

- Section 66(1) states: 'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

2.2 Policy Background

National Planning Policy Framework (NPPF)

2.2.1 In March 2012, the government published the National Planning Policy Framework (NPPF), which replaced previous national policy relating to heritage and archaeology (PPS5: Planning Policy Statement 5: Planning for the Historic Environment). The NPPF Planning Practice Guidance was published online 6th March 2014 (<http://planningguidance.planningportal.gov.uk>). The Practice Guide issued in support of PPS5 is still valid however, and English Heritage has provided documentation translating former PPS5 policy into its NPPF counterpart.

2.2.2 The Planning Practice Guide previously issued in support of PPS5, together with accompanying English Heritage documentation, was cancelled 25 March 2015, to be replaced by three Good Practice Advice (GPA) documents published by Historic England: GPA 1: The Historic Environment in Local Plans; GPA 2: Managing Significance in Decision-Taking in the Historic Environment, and GPA 3: The Setting of Heritage Assets.

2.2.3 Section 12 of the NPPF, entitled *Conserving and enhancing the historic environment* provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 12 of the NPPF can be summarised as seeking the:

- Delivery of sustainable development
- Understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment
- Conservation of England's heritage assets in a manner appropriate to their significance, and
- Recognition that heritage contributes to our knowledge and understanding of the past.

2.2.4 Section 12 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term. Paragraph 128 states that planning decisions should be based on the significance of the heritage asset and that level of detail supplied by an applicant should be proportionate to the importance of the asset and should be *no more than sufficient* to review the potential impact of the proposal upon the significance of that asset.

2.2.5 *Heritage Assets* are defined in Annex 2 of the NPPF as: a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. They include designated heritage assets (as defined in the NPPF) and assets identified by the local planning authority during the process of decision-making or through the plan-making process.

2.2.6 Annex 2 also defines *Archaeological Interest* as a heritage asset which holds or potentially could hold evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.

2.2.7 A *Designated Heritage Asset* comprises a: World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area.

2.2.8 *Significance* is defined as: The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural,

artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

2.2.9 *Setting* is defined as: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

2.2.10 In short, government policy provides a framework which:

- Protects nationally important designated Heritage Assets (which include World Heritage Sites, Scheduled Ancient Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields or Conservation Areas).
- Protects the settings of such designations.
- In appropriate circumstances seeks adequate information (from desk based assessment and field evaluation where necessary) to enable informed decisions.
- Provides for the excavation and investigation of sites not significant enough to merit *in-situ* preservation.

2.2.11 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.

National Planning Policy Guidance (NPPG)

2.2.12 The NPPF is supported by the National Planning Policy Guidance (NPPG) (published online 2014). In relation to the historic environment, paragraph 18a-001 states that the appropriate conservation of heritage assets forms one of the 'Core Planning Principles' of the NPPF.

2.2.13 Paragraph 18a-002 makes a clear statement that any decisions relating to listed buildings and their settings must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan.

2.2.14 Paragraph 18a-013 outlines that the assessment of the impact of a proposed development on the setting of a heritage asset needs to take into account and be proportionate to the significance of the asset being considered and the degree to which

the proposed development enhances or detracts from the significance of the asset and the ability to appreciate the significance.

2.2.15 The NPPG outlines that although the extent and importance of setting is often expressed in visual terms, it can also be influenced by other factors such as noise, dust and vibration. Historic relationships between places can also be an important factor stressing ties between places that may have limited or no inter-visibility with each other. There may be historic as well as aesthetic connections that contribute or enhance the significance of one or more of the heritage assets.

2.2.16 Paragraph 18a-013 concludes that the contribution of setting to an asset's significance is not dependent on public access. The ability to access and experience a setting will vary over time. LPAs may need to consider the implications of cumulative change, and the fact that developments which detract from a DHA's significance may threaten its on-going conservation by damaging its economic viability.

2.2.17 The key test in NPPF paragraphs 132-134 is whether a proposed development will result in substantial harm or less than substantial harm. However, substantial harm is not defined in the NPPF. Paragraph 18a-017 of the NPPG provides additional guidance on substantial harm stating that whether a proposal causes substantial harm will be a judgment for the decision taker. Substantial harm is a high test, which may not arise in many cases. It is not the scale of the development that is being assessed, but the degree of harm to the asset's significance.

2.2.18 Paragraph 18a-020 of the NPPG outlines what is meant by public benefits, in relation to Paragraph 134 of the NPPF. Public benefits can be anything that delivers economic, social or environmental progress, flowing from the proposed development. They should be of benefit to the public at large, but do not always have to be visible or accessible to the public in order to be genuine public benefits.

2.2.19 Despite the adoption of the NPPF which superseded PPS5 and the publication of the NPPG, the PPS 5: Historic Environment Planning Practice Guide guidance document issued by DCLG in collaboration with English Heritage and DCMS in 2010, remains valid and provides important information on the interpretation of policy and the management of the historic environment.

Local Planning Policy

2.2.20 The 'Saved' policies of the Arun District Local Plan, adopted in 2003, forms part of the statutory development plan for the district, of which the following policies are relevant to archaeology and heritage;

POLICY GEN22 – BUILDINGS OR STRUCTURES OF CHARACTER

PLANNING PERMISSION WILL NOT BE GRANTED FOR DEVELOPMENT RESULTING IN THE LOSS OF EXISTING BUILDINGS OR STRUCTURES OF INTEREST AND IMPORTANCE WHICH ARE ATTRACTIVE IN THEIR OWN RIGHT OR WHICH CONTRIBUTE TO THE CHARACTER AND APPEARANCE OF AN AREA. ALTERATIONS, EXTENSIONS OR OTHER DEVELOPMENT WHICH WOULD ADVERSELY AFFECT THE APPEARANCE OR SETTING OF SUCH BUILDINGS OR STRUCTURES WILL NOT BE PERMITTED.

POLICY AREA16 – ANCIENT MONUMENTS AND SITES OF NATIONAL ARCHAEOLOGICAL IMPORTANCE

THERE WILL BE A PRESUMPTION IN FAVOUR OF THE PRESERVATION OF SCHEDULED AND OTHER NATIONALLY IMPORTANT MONUMENTS AND ARCHAEOLOGICAL REMAINS. DEVELOPMENT WHICH ADVERSELY AFFECTS THEIR SITES OR SETTINGS WILL NOT BE PERMITTED.

POLICY AREA17 – SITES OF ARCHAEOLOGICAL INTEREST

PERMISSION WILL NOT BE GRANTED FOR DEVELOPMENT THAT WOULD BE HARMFUL TO THE SIGNIFICANT ARCHAEOLOGICAL INTEREST OF A SITE. WHERE THE PRESENCE OF ARCHAEOLOGICAL REMAINS IS KNOWN OR SUSPECTED:

- (I) THE APPLICANT MUST ARRANGE FOR ARCHAEOLOGICAL ASSESSMENT OF THE SITE TO BE CARRIED OUT BEFORE THE PLANNING APPLICATION IS DETERMINED;**
- (II) WHERE THE ASSESSMENT SHOWS THAT THE PHYSICAL PRESERVATION OF REMAINS IN SITU IS NOT JUSTIFIED, CONDITIONS MAY BE ATTACHED TO ANY PERMISSION GRANTED THAT DEVELOPMENT WILL NOT TAKE PLACE UNTIL PROVISION HAS BEEN MADE BY THE DEVELOPER FOR A PROGRAMME OF ARCHAEOLOGICAL INVESTIGATION AND RECORDING. THE PROGRAMME WILL BE CARRIED OUT PRIOR TO THE COMMENCEMENT OF THE DEVELOPMENT; AND**
- (III) WHENEVER PRACTICABLE, OPPORTUNITIES SHOULD BE TAKEN FOR THE ENHANCEMENT AND INTERPRETATION OF ARCHAEOLOGICAL REMAINS LEFT IN SITU.**

POLICY DEV11 – SETTING OF LISTED BUILDINGS

PROPOSALS WHICH ADVERSELY AFFECT THE SETTING OF A LISTED BUILDING, OR GROUP OF LISTED BUILDINGS, WILL BE RESISTED. WHERE THE PRINCIPLE OF DEVELOPMENT IN THE GROUNDS OF, OR NEAR TO LISTED BUILDINGS IS ACCEPTABLE, IT SHOULD BE SENSITIVELY DESIGNED AND CONSTRUCTED OF APPROPRIATE MATERIALS TO ENSURE THAT THE SPECIAL QUALITIES OF THE OLDER BUILDINGS REMAIN UNIMPAIRED. WHERE RELEVANT, APPROPRIATE SPACE ABOUT THE BUILDING OR BUILDINGS MUST BE RETAINED. PROPOSALS FOR MORE DISTANT BUILDINGS AND TALL STRUCTURES, INCLUDING PYLONS AND MASTS, WILL BE CAREFULLY ASSESSED IN RESPECT OF THEIR EFFECT ON THE SETTINGS OF LISTED BUILDINGS.

2.2.21 Arun District Council has produced Supplementary Planning Guidance (SPG) covering Archaeology (adopted September 2003). The SPG does not form part of the statutory development plan but is a material consideration the Council will take into account when considering an application. The SPG sets out the best practice for undertaking archaeological works related to development proposals.

2.2.22 The Council has produced a Supplementary Planning Document (SPD) covering Buildings or Structures of Character (adopted September 2005). Although the SPD does not form part of the statutory development plan, this forms a material consideration in the determination of development proposals. The SPD supports Local Plan 2003 Policy GEN22 (Buildings or Structures of Character). The SPD includes a list of Buildings or Structures of Character. There are no listings within the Site with the nearest listing being located at 56/58 Hook Lane, approximately 346m from the Site.

Emerging Local Planning Policy

2.2.23 Arun District Council are in the process of developing a new Local Plan. The emerging Local Plan was submitted to the Secretary of State for Examination in January 2015. However, the Local Plan has been placed on hold whilst the Council re-visit the OAN housing target, as per the Inspectors conclusions.

2.2.24 The emerging Local Plan policies, although not yet adopted, carry little weight in the determination of planning applications. This is in accordance with paragraph 216 of the NPPF which states that from the day of publication, decision-takers may also give weight to relevant policies in emerging plans, subject to being in accordance with certain criteria. Once adopted, the emerging Local Plan will replace the 'Saved' policies of the Local Plan (2003). The policies within the emerging Local Plan relevant to archaeology and heritage are provided in Appendix 3. These include Policy HER SP1, HER DM1, HER DM2 and HER DM6.

2.2.25 In accordance with national and local planning policy, this Cultural Heritage Assessment seeks to clarify the impact of the proposed development on the surrounding DHAs, the level and significance of the impact, and to identify the need or otherwise for mitigation measures.

3.0 GEOLOGY AND TOPOGRAPHY

3.1 Geology

3.1.1 The British Geological Survey (BGS Online 2016) indicates that the solid geology in the vicinity of the site consists of London Clay Formation (Clay, Silt and Sand) with an east-west band of Bognor Sand Member (Sand). Overlaying superficial deposits are recorded as River Terrace Deposits.

3.1.2 No geotechnical information is currently available for the site.

3.2 Topography

3.2.1 The site is located on land roughly level at a height of 6m Above Ordnance Datum (AOD).

3.2.2 Pagham Rife, a watercourse, is located approximately 900m west of the site. A drain crosses the site in the east.

4.0 ARCHAEOLOGICAL AND HISTORICAL BACKGROUND

Including Map Regression Exercise

Timescales used in this report:

Prehistoric

Palaeolithic	450,000	-	12,000	BC
Mesolithic	12,000	-	4,000	BC
Neolithic	4,000	-	1,800	BC
Bronze Age	1,800	-	600	BC
Iron Age	600	-	AD 43	

Historic

Roman	AD 43	-	410
Anglo-Saxon/Early Medieval	AD 410	-	1066
Medieval	AD 1066	-	1485
Post Medieval	AD 1486	-	1749
Modern	AD 1750	-	Present

4.1 Introduction

4.1.1 This assessment comprises a consideration of archaeological finds and features held within a 1.5km radius of the study site, referred to as the study area, held on the West Sussex Historic Environment Record (HER) (shown on Figure 2), together with a map regression exercise charting the development of the site from the 18th century until the present day.

4.1.2 This chapter reviews existing archaeological evidence for the site and the archaeological/historical background of the general area and, in accordance with the NPPF, considers the potential for as yet undiscovered archaeological evidence on the site.

4.1.3 Chapter 5 subsequently considers the site conditions and whether the proposed development will impact the theoretical archaeological potential identified below.

4.2 Early Prehistoric - Palaeolithic and Neolithic

4.2.1 There are no artefacts belonging to the Palaeolithic or Mesolithic periods recorded within the site or the 1.5km radius of the study area.

4.2.2 The presence of early Prehistoric material can be notoriously difficult to predict and specific geological horizons and topographical locations are typically required to facilitate such finds. Accordingly, a low archaeological potential is identified for Palaeolithic and Mesolithic finds on the site.

4.3 **Late Prehistoric - Neolithic and Bronze Age**

4.3.1 From around 4000 BC the mobile hunter-gathering economy of the Mesolithic gradually gave way to a more settled agriculture-based subsistence. The pace of woodland clearance to create arable and pasture-based agricultural land varied regionally and locally, depending on a wide variety of climatic, topographic, social and other factors. The trend was one of a slow, but gradually increasing pace of forest clearance.

4.3.2 A review of the HER evidence within the 1.5km study area has identified Neolithic and Bronze Age evidence comprising: a Neolithic flint axe found in the garden of 109 Rose Garden Road c.170m south of the site (MWS2224 at SZ 9014 9923) and a number of early Neolithic flint blades and core rejuvenation blades in a field at Nyetimber c. 990m southwest of the site (MWS7093 at SZ 8885 9898); a possible Bronze Age residual pottery c. 1.13km southwest of the site (MWS7024 at SZ 8910 9854), and Middle Bronze Age pottery sherds within a ditch fill recovered during an archaeological evaluation which extended into the study area c. 640m from northeast of the site (MWS11545, *Area E* in Cotswolds 2009).

4.3.3 Late Prehistoric evidence from within study area is characterised by residual material or find spots rather than *in situ* occupation activity. Overall the archaeological potential of the site for these periods can be defined as low.

4.4 **Iron Age and Roman**

4.4.1 An archaeological evaluation carried out in 2009, as part of the Eco Quarter development, extended across a wide area of land to the northeast of the site (MWS11545). Trenches in *Area D* and *Area E* of this evaluation were excavated within the study area, c. 640m northeast of the site (Cotswolds 2009). Iron Age field boundaries were identified between c. 730m and 1km of the site. A number of these field boundary ditches contained Iron Age pottery. One ditch in particular contained a substantial quantity of pottery, along with other occupation debris, indicating nearby occupation.

- 4.4.2 The archaeological evaluation of 2009 also identified evidence for Roman occupation focused outside of the study area on topographical high points (Cotswolds 2009, 55). Various Roman ditches forming part of field systems were identified within trench in *Areas C, D and E*.
- 4.4.3 The absence of sites or finds in the immediate vicinity of the study site indicates that the study site probably lay in agricultural land during these periods and overall it can reasonably be identified as having a low archaeological potential for these periods.
- 4.4.4 A Roman burial group dating to 2nd and 3rd century comprising a large urn with other vessels was identified at Crimsham Farm c. 1.26km north of the site (MWS2356 at SZ 9010 0099).
- 4.4.5 Other Roman finds from the study area include early 4th century occupation debris from a garden c. 720m southeast of the site (MWS2218 at SZ 9069 9871), Roman pottery found on the Bay Estate c. 1.04km south of the site (MWS1279 at SZ 9020 9830), and residual pottery within a ditch at Pagham c. 1km southwest of the site (MWS7024 at SZ 8910 9854).
- 4.4.6 Based on the available evidence the study site can be considered to have a low archaeological potential for the Iron Age and Roman periods. Any remains of archaeology from these periods that may be present on the site it is likely to be field boundaries and/or isolated finds.

4.5 **Anglo-Saxon & Medieval**

- 4.5.1 The only physical evidence, artefacts or structures, recorded on the HER within the study area for Anglo-Saxon activity is a Late Saxon/Early Medieval occupation debris, including a scatter of oyster shells, burnt soil and pottery c. 900m northwest of the site (MWS1920 at SZ 8930 0040).
- 4.5.2 The nearest settlement recorded in the Domesday Survey of 1086 is *Pagham* approximately 2.5km southwest of the site indicating that the site lay outside of any Anglo-Saxon settlement (Open Domesday 2016).
- 4.5.3 There is evidence, documentary and extant remains, for Medieval buildings within the study area. The 12th century Barton Manor (MWS5747 at SZ 8940 9832, NHL: 1027574) and 13th century chapel (MWS1613 at SZ 8940 9832) are located in Pagham c. 1.12km southwest of the site.

- 4.5.4 A Medieval house at Bowley Farm was originally built in the 13th century (largely rebuilt in the 17th century), c. 1.13km west of the site (MWS1595 at SZ 8865 9987). A probable Medieval fishpond is also located at this site (MWS1596 at SZ 8865 9987).
- 4.5.5 Documentary evidence indicates that the Medieval Hundred House of Aldwick was located in the present Barrack Lane, c. 810m southeast of the site (MWS2216 at SZ 9091 9877). This was a mid-14th century courthouse and centre for local government for tithings in the area; rebuilt after 1617 and demolished in 1930 (Open Plaques online 2016).
- 4.5.6 A 15th century house is located in Aldwick Road c. 590m south of the site (MWS225 at SZ 9013 9877).
- 4.5.7 Salt working mounds identified near Pagham Rife c. 1.20km northwest of the site (MWS5990 at SZ 8890 0040) are evidence for Medieval industrial activity within the study area.
- 4.5.8 Lagness Farm, c. 740m north of the site, has been identified as a Medieval farmstead (MWS11905 at SZ 9022 0046).
- 4.5.9 The 2009 archaeological evaluation (see 1.4.1) in the northeast of the site identified features relating to agricultural activity over c. 640m northwest of the site (MWS11545).
- 4.5.10 The evidence suggests that during the Anglo-Saxon and Medieval periods the site is likely to have been part of open fields away from or on the edge of any local settlements. Accordingly, a low potential is considered for the Anglo-Saxon and Medieval periods.
- 4.6 **Post Medieval and Modern (including map regression exercise)**
- 4.6.1 During the Post-Medieval period, the site lay within the agricultural hinterland north of the village of Pagham.
- 4.6.2 HER entries relating to the Post-Medieval and Modern periods are characterised by historic farmsteads or outfarms (17th century - MWS9917 at SZ 8968 0033; 18th century - MWS9274 at SZ 9128 9919, MWS12381 at SZ 8920 9872 and 19th century - see Appendix 1), brickworks, Napoleonic barracks and WW2 installations (see Appendix 1 and Fig. 2).

4.6.3 The 1724 Budgen's Map (Fig. 3) shows the general location of the site near the south coast within an area of undeveloped land. The 1778 Yeakel and Gardner Map (Fig. 4) shows the site in much the same condition, but with the site clearly occupying a number of arable fields north of present day Sefter Road and Rose Green Road. The buildings indicated on the north of this road may be those now listed as 92, 96 & 98 Rose Green.

4.6.4 The site appears unchanged into the 19th century (Fig. 6, 1805 and Fig. 7, 1825).

4.6.5 The 1849 Pagham Tithe Map (Fig. 8) and Award shows the site to comprise:

- 91 – Peak Croft – arable
- 150 – the 8 and a half acres – arable
- 152 – Peaked? – arable
- 153 – The Conscience – arable
- 154 – Long 6 acres – arable
- 155 – Stable field – arable
- 156 – field behind the yard – arable
- 182 – clappers field – arable
- 183 – the 12 acres – arable

4.6.6 The Tithe and Award also shows the a number of properties to the south west of the site which include the now listed buildings, No 92 (NHL: 1027756) and Nos 96 & 98 (NHL: 1191182) Rose Green Road:

- 160 – no info
- 161 – house, buildings and garden
- 162 – two tenements and garden
- 163 – cottage and garden

4.6.7 These buildings, set within their gardens, are well defined by their property boundaries and show no obvious relationship with the arable fields occupying the site.

4.6.8 By 1875 (Fig. 9) the site is occupied by only three agricultural fields with many of the former field boundaries having been removed. This remains the same in the 1899 and 1913 Ordnance Survey maps (Fig. 10 and 11).

4.6.9 By 1938 (Fig. 12) the site remains largely unchanged except for a house (No. 80) which was constructed in the southeast corner of the site (proposed emergency access route)

as part of wider development to the south of the site along Rose Green Road. Housing was also developed adjacent to the eastern site boundary.

4.6.10 A WW2 Infantry Section Post (MWS7086 at SZ 8989 9958) was erected in the west of the site as part of the perimeter defences around Bognor Regis. It is an uncommon sentry structure, L-shaped and constructed of brick and concrete. It is currently well preserved but is very overgrown with vegetation (Plate 9).

4.6.11 The information available for the wider setting of the WW2 Infantry Section Post, as part of Bognor's perimeter defences, is limited. Similar to other posts and pillboxes across the southern coast, it was likely built as part of a wider anti-invasion plan, comprising static defence lines, to counter the danger of invasion after the defeat at Dunkirk in May 1940 (Saunders 1989). The 2nd battalion of the Bedfordshire Regiment are recorded as taking part in the fighting at Dunkirk, and after evacuating across the English Channel they reformed at Yeovil and then took up 'defensive positions around Bognor Regis, Sussex' for a few months before moving on to Hertfordshire (www.bedfordregiment.org.uk).

4.6.12 The HER record for the WW2 Infantry Section Post refers to it being near the line of a former anti-tank ditch. It is unclear if this reference bears any relation to the 'drain' that appears adjacent to the location of the post on the 1968-71 Ordnance Survey (Fig. 13). The drain is not indicated on earlier maps but it is not clear if it preceded the infantry post, which may have been built at this location in order to take advantage of the existing ditch, or if the drain was originally constructed for the purpose of forming anti-tank defences.

4.6.13 No other posts or pillboxes are recorded within the study area on the HER. The Defence of Great Britain Project (2006) does not hold any record for this particular infantry section post, and the nearest pillbox is recorded nearly 2km away on the south coast. No clear defence line is observable.

4.6.14 The Bognor Advance Landing Ground was located c. 1km northwest of the site (MWS6818 at SU 9115 0030), evidence for which was also found during the 2009 archaeological evaluation (MSW11501, Cotswolds 2009). It was an airfield and tented camp used in WW2 by the RAF. The relationship of the infantry section post to this airfield is unclear; it may have been a means of defence against a possible attack on the airfield.

4.6.15 The 1968-71 Ordnance Survey (Fig. 13) shows the site unchanged except for a drain (also 4.6.10) which enters the site in the north skirting the northwest site boundary, then heads south along a field boundary in the west of the site, and then south along the southern site boundary. Land to the south and east of the site has also seen further development with housing.

4.6.16 By 2001 (Fig. 14) a field boundary in the north of the site was removed, and a building was erected in the southwest corner of the site. Several large farm buildings/warehouses were erected to immediate south of the site. The site remains the same till present day (Fig. 15).

4.6.17 The potential for significant below-ground archaeological remains on the study site of Post-Medieval date is low/nil. The site remained as open ground and/or agricultural fields throughout this period. The site has a high archaeological potential for the Modern period based on the presence of a WW2 infantry section post in the west of the site.

4.7 **Historic Landscape**

4.7.1 The West Sussex Historic Landscape Characterisation (HLC) records the study site to be located within an area of 'Fieldsapes', with the site identified as 'Fields around Copyhold and Sefter Farms' dated to the Post Medieval/Modern period (post-1845). The majority of the area to the north and west of the study site is also identified as modern 'Fieldsapes'. The area to the east is characterised as 'Settlement', and areas bordering the southern site boundary are primarily 'Industrial' with some 'Horticulture' (Appendix 2).

4.7.2 The HLC data and historic map regression clearly show that the site lies within modern fields, retaining only one internal field boundary in the east, which is intended to be retained in proposed developments.

4.8 **Assessment of Significance (Archaeology) and Impact on Archaeological Assets**

4.8.1 There are no designated archaeological assets located within the study site and none are expected to be impact by the proposed development.

4.8.2 The HER records an undesignated WW2 Infantry Section Post in the east of the site. Current development proposals show that this asset is within an area not intended for

residential development but is to be retained as a natural green space, with a road crossing through it. Depending on the development proposals for landscaping at this location and the positioning of the road, this asset could be at risk of demolition.

- 4.8.3 No other non-designated assets are recorded on the HER within c.170m of the site boundary.
- 4.8.4 Based on available evidence, the site appears to have remained as an open agricultural area up to and including the Post-Medieval/Modern period and is considered to have a low/negligible potential for as yet to be discovered archaeological assets. Any unknown archaeological features that may be present on the study site would most likely be of low/local significance.
- 4.8.5 On the basis of the available evidence, the proposed development is considered unlikely to have a significant or widespread archaeological impact across the majority of the site. However, it has the potential to have a severe but localised negative impact on the WW2 Infantry Section Post in the west of the site.

5.0 LISTED BUILDINGS

5.1 Introduction

5.1.1 This chapter outlines the methodology used to establish significance of built heritage assets within a 1.5km radius of the site, and how we attempt to quantify the impact of the proposed development on those assets. The assessment will then identify those assets considered to be unaffected by the development proposals and they will be excluded from further assessment. Analysis will be carried out of the impact on the setting of those built heritage assets potentially affected by the proposed development, and mitigation methods will be recommended.

5.2 Methodology

Establishing Significance

5.2.1 The starting point for evaluating the impact of a proposed development on heritage assets is to establish the significance of the heritage assets that may be impacted, and the role their setting has in that significance. Guidance on approaches to establishing significance is laid out in the NPPF and through Historic England's (previously English Heritage) documents, as summarised below.

National Planning Policy Framework

5.2.2 With regard to national and local planning policy the impact of development proposals on the setting of the nearby heritage assets need to be considered. Government policy on development affecting heritage assets and their settings is contained in the NPPF paragraphs 129 and primarily in paragraph 132. Paragraph 132 applies in particular to Designated Heritage Assets, in this case Listed Buildings. Although the emphasis of these policies is on physical change, it is clear that development within the setting of a heritage asset can harm its significance, or cause loss to its significance.

5.2.3 National Planning Practice Guidance (NPPG) was issued in March 2014, but in regards to heritage issues this adds to, but does not cancel the Practice Guide issued in support of PPS5. Historic England has provided documentation translating former PPS5 policy into its NPPF counterpart.

The Setting of Heritage Assets

- 5.2.4 Historic England's guidance on the management of change within the setting of heritage assets (2015) seeks to provide a definition for the term of 'setting' itself, as well as guidance to allow councils and applicants to assess the impact of developments upon the settings of heritage assets. There is not currently equivalent guidance for Welsh heritage assets.
- 5.2.5 The Historic England document defines setting as "the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve." Setting is also described as being a separate term to curtilage, character and context; while it is largely a visual term, setting, and thus the way in which an asset is experienced, can also be affected by noise, vibration, odour and other factors.
- 5.2.6 It provides guidance on practical and proportionate decision making with regards to the management of proposed developments and the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals.
- 5.2.7 Historic England advocates that a stepped approach should be taken to the assessment of impacts on the setting and significance of heritage assets, as follows:
- Step 1: Identify which heritage assets and their settings are affected;
 - Step 2: Assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
 - Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance;
 - Step 4: Explore the way to maximise enhancement and avoid or minimise harm.
 - Step 5: Make and document the decision and monitor outcomes.
- 5.2.8 This guidance is set out in the Historic England document 'The Setting of Heritage Assets', Historic Environment Good Practice Advice in Planning 3, March 2015, Section 12, page 6.

5.2.9 The assessments of setting and significance (and the assessments of impact) must be made with primary reference to the four main elements of special significance identified in the NPPF (4.1.7 above).

5.2.10 The NPPF requires that the impact on the significance of a heritage asset should be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 132 to 134 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and recent case law describes that for harm to be substantial, the impact on significance was required to be serious such that very much, if not all, of the significance was drained away. Such substantial impact would have to have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced

Quantifying Impacts

5.2.11 The assessment of the overall impact of the proposed residential development on the significance of heritage assets is evaluated by taking into account both the sensitivity (heritage significance) of the heritage asset and the magnitude of the effect (predicted change).

DMRB's Hierarchy of Significance

5.2.12 Currently there is no Historic England methodology for quantifying the comparative significance of heritage values and effect of the impact of the proposed development. However, a hierarchy widely used within the planning system is provided by the Highways Agency in the ‘Design Manual for Roads and Bridges’ (DMRB), published in 2007. This provides the following matrices, which have been applied in this report to give an indication of the significance of the impact.

5.2.13 The sensitivity of a heritage asset (Table 1) depends on factors such as the condition of the asset and its perceived heritage value/importance, indicated by its national, regional or local statutory or non-statutory protection and grading.

Table 1: Criteria for Assessing Level of Significance	
Very High	World Heritage Sites (including nominated sites); Assets of acknowledged international importance; Assets that can contribute significantly to acknowledged international research objectives; Historic landscapes of international value (designated or not) and extremely well preserved historic landscapes with exceptional coherence, time-depth, or other critical factor(s);
High	Scheduled Monuments and undesignated assets of Schedulable quality and importance; Grade I and Grade II* (Scotland: Category A) Listed Buildings; Other listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in the listing grade; Conservation Areas containing very important buildings; Undesignated structures of clear national importance; Assets that can contribute significantly to acknowledged national research objectives; Designated and undesignated historic landscapes of outstanding interest (including Grade I and II* Registered Parks and Gardens); undesignated landscapes of high quality and importance, and of demonstrable national value; and well preserved historic landscapes, exhibiting considerable coherence, time-depth or other critical factor(s).
Medium	Designated or undesignated assets that contribute to regional research objectives; Grade II (Scotland: Category B) Listed Buildings; Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical associations; Conservation Areas containing buildings that contribute significantly to their historic character; Historic Townscape or built-up areas with important historic integrity in their buildings, or built settings (e.g. including street furniture and other structures); Designated special historic landscapes of special historic

	interest (including Grade II Registered Parks and Gardens); undesignated historic landscapes that would justify such a designation; landscapes of regional value; averagely well-preserved historic landscapes with reasonable coherence, time-depth or other critical factor(s).
Low	Designated and undesignated assets of local importance including those compromised by poor preservation and/or poor survival of contextual associations; Assets of limited value, but with potential to contribute to local research objectives; 'Locally Listed' buildings (Scotland Category C(S) Listed Buildings) and historic (unlisted) buildings of modest quality in their fabric or historical association; Historic Townscape or built-up areas of limited historic integrity in their buildings, or built settings (e.g. including street furniture and other structures); Robust undesignated historic landscapes; historic landscapes with importance to local interest groups; historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations
Negligible	Assets with very little or no surviving archaeological interest Buildings of no architectural or historical note; buildings of an intrusive character Landscapes with little or no significant historical interest.
Uncertain	Buildings with some hidden (i.e. inaccessible) potential for historic significance. The importance of the resource has not been ascertained

5.2.14 The assessment of the magnitude of effect (Table 2) to the significance of designated assets is based upon the extent to which factors that contribute to the significance of the assets would be affected. The nature of the proposed development is such that there will be no physical impacts on designated heritage assets, but there is the potential to affect the setting of nearby DHAs.

Table 2: Magnitude of Effect	
Major	Change to key historic building elements such that the resource is totally altered. Change to most or all key archaeological materials such that the resource is totally altered. Comprehensive changes to setting.
Moderate	Change to many key historic building elements, such that the resource is significantly modified. Change to many key archaeological materials, such that the resource is clearly modified. Considerable changes to setting that affect the character of the asset. Changes to the setting of an historic building, such that it is significantly modified.
Minor	Changes to key historic building elements, such that the asset is slightly different. Changes to key archaeological materials, such that the asset is slightly altered Changes to setting of an historic building, such that it is noticeably changed. Slight changes to an archaeological setting.
Negligible	Slight changes to historic buildings elements or setting that hardly affect it. Very minor changes to archaeological materials, or setting.
No Change	No change to fabric or setting

5.2.15 The significance of the impact of the proposed development is established using the matrix in Table 3, which combines the ratings for the sensitivity of the heritage asset and the magnitude of effect.

5.2.16 This process is not fully quantitative, but relies on professional judgement at each step. However, the factors considered in informing these judgements and in arriving at the various rankings of value and magnitude of impacts are observable facts (i.e. numbers of assets, spatial relationships, designations, impacts).

Table 3: Significance of Impact						
Heritage Value	Very High	Neutral	Slight	Moderate/ Large	Large/ Very large	Very large
	High	Neutral	Slight	Moderate/ Slight	Moderate/ Large	Large/ Very large
	Medium	Neutral	Neutral/ Slight	Slight	Moderate	Moderate/ Large
	Low	Neutral	Neutral/ Slight	Neutral/ Slight	Slight	Slight/ Moderate
	Negligible	Neutral	Neutral	Neutral/ Slight	Neutral/ Slight	Slight
		No Change	Negligible	Minor	Moderate	Major
	Magnitude of Effect					

5.2.17 The NPPF outlines policy tests in assessing the effect of proposed developments on the significance of heritage assets, and whether this constitutes ‘substantial harm’ (NPPF paras 132-135; see sections 2.2.9-2.2.11 above).

5.2.18 ‘Substantial harm’ is described by the NPPG as “a high test...It is the degree of harm to the asset’s significance rather than the scale of development that is to be assessed” (NPPG 18a para. 17). In terms of the assessment of Significance of Impact (Table 3), ‘substantial harm’ would correlate broadly with a ‘very large’ or ‘large/very large’ ranking. The development scheme would require wholly exceptional public benefits, or met the criteria in paragraph 133 of the NPPF.

5.2.19 The other rankings in Table 3 would require a balanced judgement, weighing the development scheme benefits against the relative level of impact on DHAs.

5.2.20 Therefore, in accordance with HE guidelines (‘Conservation Principles’ and ‘The Setting of Heritage Assets’), and using the above definitions of criteria supplied by the DMRB, the following section undertakes a staged approach to understanding the significance of relevant designated heritage assets, their settings and the significance of impacts from the proposed development.

5.3 **Setting Impacts**

5.3.1 A study area with a buffer of 1.5 km from the study site boundary was chosen based on topographical factors, professional judgement, and the nature and distribution of the surrounding designated heritage assets.

5.3.2 The starting point of the analysis is to identify those heritage assets likely to be affected by the development proposal. Figure 3 shows the distribution of Designated Heritage Assets (DHA) within 1.5 km. Assets within the study area comprise:

- 1 Grade II* listed buildings
- 28 Grade II listed buildings
- 2 DeListed buildings

5.3.3 The guidance then asks us to consider if the development is capable of affecting the contribution of a heritage asset's setting to its significance, or the appreciation of its significance. If so, it can be considered as falling within the asset's setting.

5.3.4 Figure 3 shows the location of the DHA's in relation to the study site.

5.3.5 This assessment makes reference to the 'immediate' and 'extended' setting of heritage assets (English Heritage, 2011a; section 2.2). The 'immediate' setting comprises the area with the most immediate and direct relevance to the asset's significance. For example, a churchyard would form the immediate setting to a church, or a farmyard to a farmhouse. The 'extended' setting relates to the wider area that an asset may also acquire significance from, such as its environs within an area of specific character or a district within a town. This also includes the area which may have a visual impact on how a designated heritage asset is experienced, such as views to or from a particular asset at distance. However, it is important to note that "setting does not have a fixed boundary and cannot be definitively or permanently described as a spatially bounded area" (EH, 2011a).

5.4 **Assets Excluded from Further Assessment**

5.4.1 Assessment of the information compiled from the proposed development plan, English Heritage list entries and the site inspection made clear that the development proposals will not impact the setting, and therefore will not affect the significance of the majority of the designated heritage assets, within a 1.5 km radius due to a complete absence of inter-visibility between the assets and the site, with the site clearly not contributing to

the significance of the heritage assets or forming part of their setting. These are summarised below.

Assets

List Entry	Name	Grade	Easting	Northing	Distance from site (m)
1275625	NYETIMBER FORGE	II	489166	98613	SW 1030
1353788	BARN TO NORTH EAST OF ALDWICK FARMHOUSE, FRONTING ONTO THE ROAD	II	491307	99165	SE 980
1353866	NEAL FARMHOUSE	II	490237	100433	N 710
1353867	THE LION PUBLIC HOUSE	II	489282	98561	SW 1010
1353885	GREENSLEEVES	II	489146	98493	SW 1150
1353886	THE INGELNOOK RESTAURANT	II	489202	98723	SW 930
1027573	NYETIMBER HOUSE	II	489167	98614	SW 1040
1027574	BARTON MANOR	II	489406	98325	SW 1170
1027575	GROUP OF FOUR BARNS AT MILL FARM	II	489193	98750	SW 920
1027576	MILL COTTAGE	II	489249	98785	SW 850
1027577	NYETIMBER WINDMILL	II	489226	98826	SW 830
1027578	ROOKERY FARMHOUSE	II	489281	99092	SW 600
1027579	SEFTER FARMHOUSE AND SEFTER GRANARY	II	489244	99799	W 650
1027580	THE WHITE HOUSE	II	489571	100796	NW 1140
1027581	COPYHOLD FARMHOUSE	II	489656	100330	NW 680
1027582	MARTINS COTTAGE AND SUMMER LANE COTTAGE	II	489117	98425	SW 1220
1027614	LAGNERSH FARMHOUSE	II	490264	100581	N 860
1027755	PRYOR'S FARMHOUSE	II	490087	98505	S 910
1027766	ALDWICK FARMHOUSE	II	491263	99159	SE 930
1027767	OLD PLACE	II	491178	98959	SE 930
1398410	FORMER ALDWICK VILLAGE POUND, NOW IN THE GROUNDS OF POUND HOUSE	DL	491107	98788	SE 970
1027770	OLD MANOR COTTAGE	II	490906	98803	SE 800
1027772	WEST LODGE	II	490520	98136	S 1220
1191143	WILLOWHALE COTTAGE	II	490134	98770	S 630
1234334	MORELLS FARMHOUSE	II	490756	100353	NE 760
1216908	CRIMSHAM MANOR	II	489571	100805	NW 1150
1398425	THE KNIFE AND FORK RESTAURANT	DL	489208	98520	SW 1090
1216955	PENNI COTT'S FARMHOUSE	II	489618	100757	NW 1100
1232654	BOWLEY FARMHOUSE	II*	488660	99873	W 1120

5.5 Assets Included in Further Setting Assessment.

- 5.5.1 The proposed development has the potential to have a minor/negligible impact on two listed buildings and therefore these are included in the further setting assessment.

5.6 92 Rose Green Road

- 5.6.1 The Grade II listed semi-detached pair of cottages, dated to the mid-18th century is located c. 50m south of the study site.

- 5.6.2 The listed building has a very close intimate setting of gardens, associated outbuildings and mature tree growth, which serve as the immediate setting of the building and how it is experienced.

- 5.6.3 The building is screened from the main proposed development area to the north by 20th century properties and a thick tall hedge/tree line. However, it can be viewed from the front garden of No. 80 Rose Green Road in the southeast of the site.

- 5.6.4 Development proposals include demolishing this 20th century property at No. 80 Rose Green Road and replacing it with an emergency, pedestrian and cyclist access point (Fig. 16). The trees/hedgerows along southern site boundary, which currently help screen the building from the rest of site, are intended to be maintained. Further buffering will be provided by the creation of green infrastructure comprising swales and wetland features, with potential trees and thickets.

- 5.6.5 As the study site is not considered to form part of the immediate intimate setting of the listed building, and as a result of design measures, the proposed development would be considered to have a minor/negligible impact upon the significance of the listed building.

5.7 96 & 98 Rose Green Road

- 5.7.1 This Grade II listed property comprises a long range divided into two cottages with a thatched roof and is dated to the 17th century, located c. 80m south of the site.

- 5.7.2 The listed building has a very close intimate setting of gardens with tall hedges, which serve as the immediate setting of the building and how it is experienced.

- 5.7.3 The building is screened from the main proposed development area to the north by 20th century properties and a thick tall hedge/tree line. There are no views between the site and the listed building. As a result the proposed development on the study site would be considered to have no impact upon the setting of the building.

6.0 SITE CONDITIONS AND THE PROPOSED DEVELOPMENT

Site Conditions

- 6.1 The study site comprises agricultural land primarily under crop, with the western area predominantly as scrubby grassland, and a building with a gravelled car parking area in the southwest corner of the site (Fig. 15, Plate 1-9). The site is largely bordered by thick tree/hedgerows.
- 6.2 The study site is bounded by agricultural fields to the north and west, by modern housing to the east and south, and by Sefter Road to the southwest.
- 6.3 Past archaeological impacts will relate to ploughing with moderate but widespread archaeological impacts. The construction of the current buildings, in the southwest of the site and at No. 80 Rose Green Road in the southeast, will have had a severe but localised negative archaeological impact.

Proposed Development

- 6.4 Details of the proposed development are illustrated in the Master Plan (Fig. 16). This comprises an 'outline application for the development of up to 280 dwellings (including affordable homes), provision of land for a replacement scout hut, land for an Ambulance Community Response Post facility and land for a 1FE Primary school. Provision of a primary vehicular access from Sefter Road and demolition of No. 80 Rose Green Road and creation of a pedestrian and emergency only access. Provision of Public Open Spaces including associated children's play areas, landscaping, drainage and earthworks'.
- 6.5 Current proposals are expected to maintain the boundary of the site with trees and thickets.
- 6.6 On the basis of the available evidence the proposed development is unlikely to have either a significant or widespread archaeological impact. Unknown archaeological remains of local importance could be encountered.
- 6.7 The WW2 Infantry Section Post currently located in the west of the site is to be removed prior to development. Full building recording of the infantry post will be carried out prior to its removal.

- 6.8 As long as existing hedgerows and boundary planting is retained the proposed development is not considered to have a negative impact upon the setting of any built heritage assets.

7.0 CONCLUSIONS

- 7.1 Land north of Sefter Road, Pagham, Bognor Regis is proposed for development and has been reviewed for its heritage potential and possible impacts on above ground (listed buildings) and below ground (archaeology) heritage assets.
- 7.2 The site is thought to have a low archaeological potential for the Prehistoric, Roman, Anglo-Saxon and Medieval periods and a low/negligible archaeological potential for the Post Medieval period. The site has a high archaeological potential for the Modern period based on the presence of a WW2 Infantry Section Post in the west of the site.
- 7.3 The site does not lie within a Conservation Area or an Archaeological Notification Area.
- 7.4 It is concluded that the proposed development will have no impact on the settings of the majority of the designated heritage assets (DHA) within a 1.5 km buffer of the site boundary.
- 7.5 The proposed development could potentially have a minor/negligible impact on the settings of two listed buildings at 92, 96 and 98 Rose Green Road, within a 1.5 km buffer of the site boundary. However, mitigation comprising tree and hedge planting would eliminate these impacts.
- 7.6 It is stated within Historic England's guidance on 'The Setting of Heritage Assets' that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals.
- 7.7 Although no pre-Modern archaeological assets are known on the site, due to a lack of previous development on the site and archaeological investigation in the area, the archaeological advisors for the local planning authority may take a precautionary approach and request further archaeological investigation to establish the archaeological potential of the site.
- 7.8 On the basis of the available evidence, it is considered that any further archaeological mitigation measures deemed necessary could be secured by an archaeological planning condition attached to any planning consent.

- 7.9 Future plant screening at the site to protect the setting of built heritage assets, and full building recording of the WW2 Infantry Section Post located in the west of the site, is recommended, and could also be a condition to any planning consent.

SOURCES CONSULTED

General

West Sussex Historic Environment Record
British Library

Internet

<http://archaeologydataservice.ac.uk>
<http://bedfordregiment.org.uk/index.html>
<http://www.british-history.ac.uk/>
<https://finds.org.uk/database/>
<https://www.historicengland.org.uk/listing/the-list>
<https://opendomesday.org.uk>
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Cartographic

1724 Budgen Map of Sussex
1763 Kitchen Map of Sussex
1778 Yeakel and Gardner Map of Sussex
1795 Gardner and Gream Map of Sussex
1805 Ordnance Survey Drawing
1825 Greenwood and Greenwood Map of Sussex
1849 Pagham Tithe Map
1875 Ordnance Survey
1899 Ordnance Survey
1913 Ordnance Survey
1938 Ordnance Survey
1968-71 Ordnance Survey
2001 Google Earth View
2015 Google Earth View

Appendix 1:

Gazetteer of HER Records and Archaeological Events within 1.5km of the Study Site centre

Appendix 1: Gazetteer of HER Records and Archaeological Events within 1.5km of the Study Site centre

Monument Records

MonUID	Name
MWS1279	Roman pottery - Bay Estate
MWS1595	Bowley Farm, North Mundham
MWS1596	Fish Pond, Bowley Farm
MWS1613	Chapel, Barton Manor, Pagham
MWS1920	Early Medieval Occupation Debris, Lagness
MWS1928	Medieval Pottery, Lagness
MWS2216	Manor house - Aldwick
MWS2218	Roman settlement - Aldwick
MWS2224	Neolithic axe - Bognor
MWS2225	C15 cottage - Bognor
MWS2356	Roman Burial - Crimsham farm
MWS4728	Brickfield at junction of Hook Lane and Rose Green
MWS4729	Brickworks East of Lion Road
MWS4730	Brickworks on North side of Nyetimber
MWS4499	Nyetimber Mill
MWS10309	Site of Historic Farmstead in Nyetimber, Pagham
MWS5747	Barton Manor, Pagham
MWS5990	Salt Working Site, Lagness
MWS6818	Bognor Regis Advanced Landing Ground
MWS6742	Aldwick Barracks
MWS7024	Nyetimber Garage, Pagham, Archaeological Intervention
MWS7029	Aldwick Farm, Aldwick, Bognor Regis - Archaeological investigations
MWS7086	Pillbox or Infantry Section Post, Pagham
MWS7093	Lithic and Roman Activity, Mill Farm Caravan Site
MWS7520	Royal Observer Corps Monitoring Post (Cold War) - Pagham
MWS8198	Auxiliary Unit Special Duties Outstation - Lagness
MWS8672	Coastguard Station - Aldwick
MWS9274	Aldwick Farm Historic Farmstead, Aldwick
MWS9364	Barton Farm Historic Farmstead, Pagham
MWS9917	Copyhold Farm Historic Farmstead, Pagham
MWS9932	Site of Covets Farm Historic Farmstead, Aldwick
MWS10294	Historic Farmstead, Aldwick
MWS10321	Site of Historic Farmstead to the North-East of Barton Farm, Pagham
MWS10393	Historic Farmstead to the South-East of Willowhale Farm, Aldwick
MWS11409	Hewart's Barn, Historic Farmstead, Pagham
MWS11501	Site of Highwoods Barn, Historic Outfarm, Pagham
MWS11656	The former Ship Inn, Aldwick Street, Bognor Regis
MWS11905	Site of Ladybrook Barn Historic Outfarm, Felpham
MWS12290	Wells recorded within the grounds of 5 Parkfield Avenue, Aldwick
MWS12381	Mill Farm Historic Farmstead, Pagham
MWS12422	Morrells Farm Historic Farmstead, Pagham
MWS12606	Site of North Barn Historic Outfarm, Pagham
MWS13058	Site of Historic Outfarm North West of Pryors Barn, Aldwick
MWS13301	Penfolds Farm Historic Farmstead, Pagham
MWS13303	Pennicotts Farm Historic Farmstead, Pagham
MWS13381	Pryors Barn Historic Farmstead, Aldwick
MWS11545	Bognor Regis Eco-Quarter West Sussex, Archeological Evaluation
MWS8620	Sefter Farm, Pagham - Archaeological Works
MWS12290	Wells recorded within the grounds of 5 Parkfield Avenue, Aldwick
MWS13066	Land to the rear of 12-14 Old Farm Close, Aldwick - Archaeological Investigations

Event Records

EvUID	Event Name
EWS1574	Barton Manor, Pagham - Evaluation
EWS1040	Archaeological Works at Sefter Farm, Pagham
EWS1314	Bognor Regis Eco-Quarter West Sussex, Archeological Evaluation

EWS1412	Land at North-West Bognor Regis: Archaeological Desk Based Assessment
EWS1575	Aldwick Farm, Aldwick, Bognor Regis
EWS1660	Land to the Rear of 12-14 Old Farm Close, Aldwick - Archaeological Investigations

Appendix 2:

Historic Landscape Characterisation (data from West Sussex HER)



- Site Boundary
- Search Radius 1.5km
- Historic Landscape Characterisation**
- Designed Landscapes
- Fields
- Horticulture
- Industry
- Recreation
- Settlement
- Unimproved/Unenclosed
- Water
- Woodland



Scale at A3: 1:12,000
0 400 m

Appendix 2:
Historic Landscape
Characterisation
(data from West
Sussex HER)

Appendix 3:

Arun District Council – Emerging Local Planning Policy

Appendix 3

Arun District Council – Emerging Local Planning Policy

POLICY HER SP1 – THE HISTORIC ENVIRONMENT

THE COUNCIL WILL GRANT PLANNING PERMISSION FOR DEVELOPMENT PROPOSALS THAT CONSERVE OR ENHANCE THE HISTORIC ENVIRONMENT OF THE DISTRICT, SPECIFICALLY FOR CONSERVATION AREAS; STATUTORY LISTED BUILDINGS; AREAS OF SPECIAL CHARACTER; LOCALLY LISTED BUILDINGS OR STRUCTURES OF CHARACTER.

DEVELOPMENT LIKELY TO PRJUDICE ANY OF THE ABOVE, INCLUDING THEIR SETTINGS, WILL BE REFUSED. ANY PROPOSALS FOR DEVELOPMENT WILL BE REQUIRED TO COMPLY WITH ALL OTHER RELEVANT POLICIES AND REFLECT ANY RELEVANT APPRAISALS OR MANAGEMENT PROPOSALS ADOPTED BY THE COUNCIL.

THE COUNCIL WILL ENCOURAGE THE RE-USE OF VACANT OR UNDERUSED LISTED BUILDINGS OR UNLISTED BUILDINGS BY APPROVING PROPOSALS THAT CONTRIBUTE POSITIVELY TO THEIR CONSERVATION EITHER INDIVIDUALLY OR AS PART OF WIDER STRATEGIES FOR REGENERATION. WHERE CHANGES OF USE ARE PROPOSED, THE COUNCIL WILL CONSIDER THESE IN A FLEXIBLE WAY BUT WILL FAVOUR PROPOSALS WHICH IMPROVE PUBLIC ACCESS WHERE THESE ARE NOT PREJUDICIAL TO EXISTING CHARACTER OR APPEARANCE.

THE COUNCIL WILL TAKE A PRO-ACTIVE STANCE TO ANY HERITAGE ASSETS THAT MAY BE AT RISK. THIS WILL INCLUDE WORKING WITH PROPERTY OWNERS TO FIND A USE THAT WILL ENABLE THEM TO BE PUT BACK IN TO USE.

DEVELOPMENT PROPOSALS INVOLVING THE DEMOLITION OF LISTED BUILDINGS OR ADVERSELY AFFECTING A CONSERVATION AREA WILL NOT BE PERMITTED OTHER THAN IN EXCEPTIONAL CIRCUMSTANCES WHERE REPAIR OR RE-USE ARE NOT PRACTICABLE OPTIONS AND WHERE REPLACEMENT BUILDINGS AND USES OF EXCEPTIONAL QUALITY ARE PROPOSED.

POLICY HER DM1 – LISTED BUILDINGS

PROPOSALS AFFECTING STATUTORY LISTED BUILDINGS WILL BE REQUIRED TO:

- A. PRESERVE OR ENHANCE THE HISTORIC CHARACTER, QUALITIES AND SPECIAL INTEREST OF THE BUILDINGS;**
- B. BE NECESSARY AND NOT DETRIMENTAL TO THE ARCHITECTURAL AND HISTORICAL INTEGRITY AND DETAILING OF A LISTED BUILDING'S EXTERIOR;**
- C. PROTECT THE ARCHITECTURAL AND HISTORICAL INTEGRITY AND DETAILING OF A LISTED BUILDING'S INTERIOR;**
- D. PROTECT THE SPECIAL INTEREST OF BUILDINGS OF ARCHITECTURAL OR HISTORIC INTEREST; AND**
- E. PROTECT, AND WHERE POSSIBLE ENHANCE THE SETTING OF THE BUILDING.**

THERE IS A PRESUMPTION IN FAVOUR OF THE PRESERVATION OR ENHANCEMENT OF LISTED BUILDINGS AND STRUCTURES AND THEREFORE THE TOTAL OR SUBSTANTIAL DEMOLITION OF A LISTED BUILDING WILL ONLY BE PERMITTED IN WHOLLY

EXCEPTIONAL CIRCUMSTANCES, AND WHERE IT MEETS THE FOLLOWING SPECIFIC CRITERIA:

- F. CLEAR AND CONVINCING EVIDENCE HAS BEEN PROVIDED THAT VIABLE ALTERNATIVE USES CANNOT BE FOUND, THROUGH, FOR EXAMPLE THE OFFER OF THE UNRESTRICTED FREEHOLD OF THE PROPERTY ON THE MARKET AT A REALISTIC PRICE REFLECTING ITS CONDITION AND THAT PRESERVATION, IN SOME FORM OF CHARITABLE OR COMMUNITY OWNERSHIP, IS NOT POSSIBLE;**
- G. THE REDEVELOPMENT WOULD PRODUCE SUBSTANTIAL BENEFITS FOR THE COMMUNITY WHICH WOULD DECISIVELY OUTWEIGH THE RESULTING LOSS FROM DEMOLITION OR MAJOR ALTERATION; AND**
- H. THE PHYSICAL CONDITION OF THE BUILDING HAS DETERIORATED, THROUGH NO FAULT OF THE OWNER/ APPLICANT FOR WHICH EVIDENCE CAN BE SUBMITTED, TO A POINT THAT THE COST OF RETAINING THE BUILDING OUTWEIGHS ITS IMPORTANCE AND THE VALUE DERIVED FROM ITS RETENTION. A COMPREHENSIVE STRUCTURAL REPORT WILL BE REQUIRED TO SUPPORT THIS.**

THE COUNCIL WILL SUPPORT PROPOSALS FOR ALTERNATIVE USES FOR LISTED BUILDINGS WHICH RETAIN THEIR STRUCTURE AND PRESERVE CHARACTER AND SETTING WHERE THE CHANGE WILL PROVIDE FOR THE LONG TERM CONSERVATION OF THE STRUCTURE AND FABRIC OF THE BUILDING.

THE COUNCIL WILL ONLY SUPPORT ALTERATIONS TO LISTED BUILDINGS IN ORDER TO MITIGATE CLIMATE CHANGE WHERE SUCH PROPOSALS RESPECT THE SIGNIFICANCE OF THE LISTED BUILDING AND DO NOT HAVE AN ADVERSE IMPACT ON ITS APPEARANCE, CHARACTER OR HISTORIC FABRIC.

THE COUNCIL WILL ONLY APPROVE A PROPOSAL FOR ENABLING DEVELOPMENT WHERE THERE IS NO OTHER ALTERNATIVE OPTION AVAILABLE AND THE BENEFITS OF SUCH A SCHEME OUTWEIGH ANY DIS-BENEFITS THAT ARISE.

DEVELOPMENTS SHALL ALSO BE CONSISTENT WITH ALL OTHER LOCAL PLAN POLICIES.

POLICY HER DM2 – LOCALLY LISTED BUILDINGS OR STRUCTURES OF CHARACTER

THE COUNCIL WILL CONTINUE TO IDENTIFY AND COMPILE A LIST OF LOCALLY IMPORTANT BUILDINGS AND STRUCTURES WHICH MAKE A POSITIVE CONTRIBUTION TO LOCAL DISTINCTIVENESS USING THE FOLLOWING CRITERIA:

- A. BUILDINGS OF OUTSTANDING DESIGN, DETAILING, APPEARANCE OR SPECIAL INTEREST BECAUSE OF THE USE OF MATERIALS.**
- B. BUILDINGS WHICH ARE EXTREMELY GOOD EXAMPLES OF TRADITIONAL OR ESTABLISHED STYLE, OR OF UNUSUAL TYPE.**
- C. IN SPECIAL CASES, BUILDINGS OR STRUCTURES WHICH CONTRIBUTE TOWARDS THE LOCAL TOWNSCAPE OR HAVE IMPORTANT HISTORICAL OR SOCIAL ASSOCIATIONS.**
- D. ALL BUILDINGS MUST BE LARGELY INTACT AND NOT ADVERSELY AFFECTED BY LATER EXTENSIONS OR ALTERATIONS.**
- E. PREFERABLY, ALTHOUGH NOT EXCLUSIVELY, THEY SHOULD MAKE A POSITIVE CONTRIBUTION TO THEIR SURROUNDINGS OR THE STREET SCENE.**

PLANNING PERMISSION WILL ONLY BE GRANTED FOR DEVELOPMENT WHICH RESULTS IN THE LOSS OF EXISTING BUILDINGS OR STRUCTURES OF CHARACTER WHEN IT CAN BE DEMONSTRATED THAT THE BUILDING OR STRUCTURE CANNOT BE PUT TO A BENEFICIAL USE OR RE-USE. REPLACEMENT STRUCTURES WILL NEED TO BE OF A HIGH QUALITY DESIGN.

PROPOSALS FOR THE ALTERATION OR EXTENSION OF BUILDINGS ON THE LOCAL LIST WILL BE EXPECTED TO RELATE SENSITIVELY TO THE BUILDING OR STRUCTURE AND ITS SETTING AND RESPECT ITS ARCHITECTURAL, LANDSCAPE OR HISTORIC INTEREST. THE COUNCIL WILL SEEK TO PRESERVE FEATURES OF SUCH BUILDINGS WHICH CONTRIBUTE TO THAT INTEREST.

DEVELOPMENTS SHALL ALSO BE CONSISTENT WITH ALL OTHER LOCAL PLAN POLICIES.

POLICY HER DM6 – SITES OF ARCHAEOLOGICAL INTEREST

THERE WILL BE A PRESUMPTION IN FAVOUR OF THE PRESERVATION OF SCHEDULED AND OTHER NATIONALLY IMPORTANT MONUMENTS AND ARCHAEOLOGICAL REMAINS. WHERE PROPOSED DEVELOPMENTS WILL HAVE EITHER A DIRECT IMPACT ON SITES LISTED IN TABLE 16.1 (I.E. DEVELOPMENTS REQUIRING SCHEDULED MONUMENT CONSENT) OR WHERE DEVELOPMENTS WILL HAVE AN INDIRECT IMPACT ON THE SETTINGS OF THOSE SITES LISTED IN TABLE 16.1, OR WHERE A SITE ON WHICH DEVELOPMENT IS PROPOSED HAS THE POTENTIAL TO INCLUDE HERITAGE ASSETS WITH ARCHAEOLOGICAL INTEREST (HAVING CONSULTED THE HISTORIC ENVIRONMENT RECORD) PERMISSION WILL ONLY BE GRANTED WHERE IT CAN BE DEMONSTRATED THAT DEVELOPMENT WILL NOT BE HARMFUL TO THE ARCHAEOLOGICAL INTEREST OF THESE SITES. IN ALL SUCH INSTANCES:

- A. APPLICANTS MUST ARRANGE FOR A DESK BASED ARCHAEOLOGICAL ASSESSMENT OF THE PROPOSED DEVELOPMENT SITE TO BE UNDERTAKEN BY A SUITABLY QUALIFIED PERSON. THE ARCHAEOLOGICAL ASSESSMENT WILL TAKE THE FORM OF A FACTUAL REVIEW OF THE KNOWN INFORMATION ON HISTORIC ASSETS AND AN APPRAISAL OF THESE ASSETS. THIS INFORMATION SHALL ACCOMPANY THE PLANNING APPLICATION, AND, WHERE NOT SUPPLIED, WILL BE REQUIRED BEFORE ANY PLANNING APPLICATION IS DETERMINED*. WHERE THE PLANNING AUTHORITY HAS REASON TO BELIEVE, EITHER FROM THE ARCHAEOLOGICAL ASSESSMENT AS ABOVE, OR FROM OTHER EVIDENCE SOURCES, THAT SIGNIFICANT ARCHAEOLOGICAL REMAINS MAY EXIST, FURTHER ASSESSMENT IN THE FORM OF A FIELD EVALUATION WILL BE REQUIRED TO BE CARRIED OUT BEFORE THE PLANNING APPLICATION IS DETERMINED. ANY FIELD SURVEY UNDERTAKEN SHALL BE CARRIED OUT BY A PROFESSIONALLY QUALIFIED ARCHAEOLOGICAL ORGANISATION OR CONSULTANT ONLY. ALL STAGES OF ARCHAEOLOGICAL FIELDWORK SHALL BE SUBJECT TO A WRITTEN SCHEME OF INVESTIGATION APPROVED BY THE LOCAL PLANNING AUTHORITY. NO DEVELOPMENT SHALL TAKE PLACE ON THE PROPOSED DEVELOPMENT SITE UNTIL THE APPLICANT, OR THEIR AGENTS OR SUCCESSORS IN TITLE, IS IN RECEIPT OF A WRITTEN SCHEME OF INVESTIGATION THAT HAS BEEN APPROVED BY THE LOCAL PLANNING AUTHORITY; OR
- B. A FIELD EVALUATION AS ABOVE, WHICH SHALL INCLUDE A HISTORIC ENVIRONMENTAL RECORD OF THE ARCHAEOLOGICAL SITE WITHOUT THE REQUIREMENT TO UNDERTAKE A SEPARATE DESK BASED ARCHAEOLOGICAL ASSESSMENT.
- C. PRESERVATION IN SITU OF ARCHAEOLOGICAL SITES OR REMNANTS OF SUCH SITES, IS THE PREFERRED OPTION. HOWEVER, WHERE THE ASSESSMENT, WHICH SHALL BE SUBJECT TO A WRITTEN SCHEME OF INVESTIGATION, SHOWS THAT THE PRESERVATION OF ARCHAEOLOGICAL REMAINS IN SITU IS NOT JUSTIFIED, CONDITIONS MAY BE ATTACHED TO ANY PERMISSION GRANTED THAT DEVELOPMENT WILL NOT TAKE PLACE UNTIL PROVISION HAS BEEN MADE BY THE DEVELOPER FOR A PROGRAMME OF ARCHAEOLOGICAL INVESTIGATION AND RECORDING. ANY SUCH PROGRAMME SHALL BE CARRIED OUT PRIOR TO THE COMMENCEMENT OF THE DEVELOPMENT.
- D. WHENEVER PRACTICABLE, OPPORTUNITIES SHOULD BE TAKEN FOR THE ENHANCEMENT AND INTERPRETATION OF ARCHAEOLOGICAL REMAINS LEFT IN SITU. DEVELOPERS SHALL RECORD ANY HERITAGE ASSETS TO BE LOST (WHOLLY OR IN PART) IN A MANNER PROPORTIONATE TO THEIR IMPORTANCE AND POSSIBLE IMPACT, AND TO MAKE THIS EVIDENCE (AND ANY ARCHIVE GENERATED) PUBLICLY ACCESSIBLE.

- E. WHERE DEVELOPMENT IS TO BE PHASED THE PRESUMPTION WOULD NORMALLY BE THAT THE WHOLE SITE SHOULD BE RECORDED AS ONE PROJECT IN ORDER TO MAINTAIN THE CONTINUITY OF THE ARCHAEOLOGICAL RECORD.**
- F. DEVELOPMENTS SHALL ALSO BE CONSISTENT WITH ALL OTHER LOCAL PLAN POLICIES.**

*** THOSE SUBMITTING PLANNING APPLICATIONS ARE STRONGLY ADVISED HOWEVER TO UNDERTAKE A DESK BASED ARCHAEOLOGICAL ASSESSMENT IN ADVANCE OF A PLANNING APPLICATION BEING LODGED AS, DEPENDING ON THE OUTCOME OF THIS ASSESSMENT, FURTHER ASSESSMENT IN THE FORM OF A FIELD EVALUATION MAY BE REQUIRED (AS OUTLINED IN (1) ABOVE).**

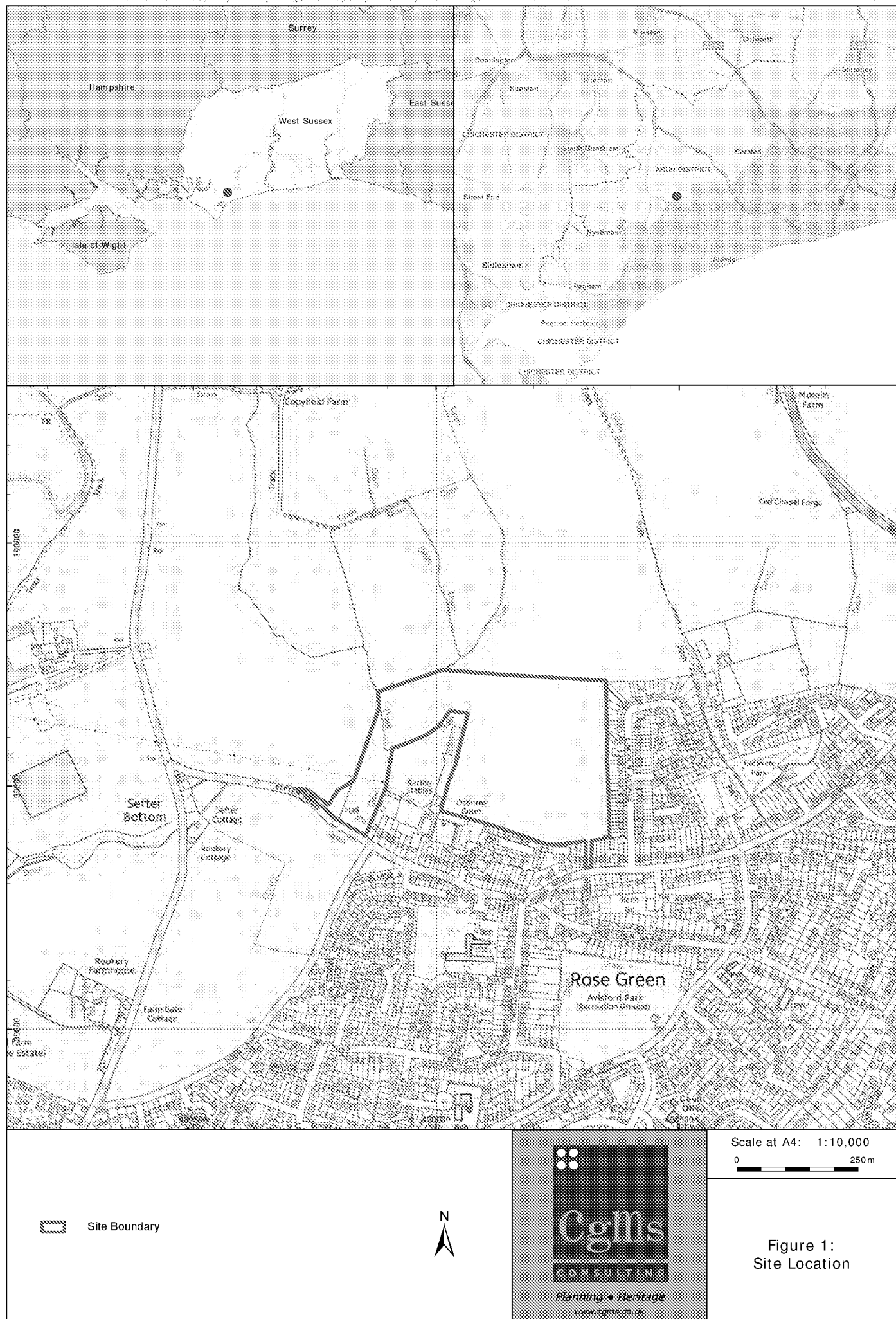
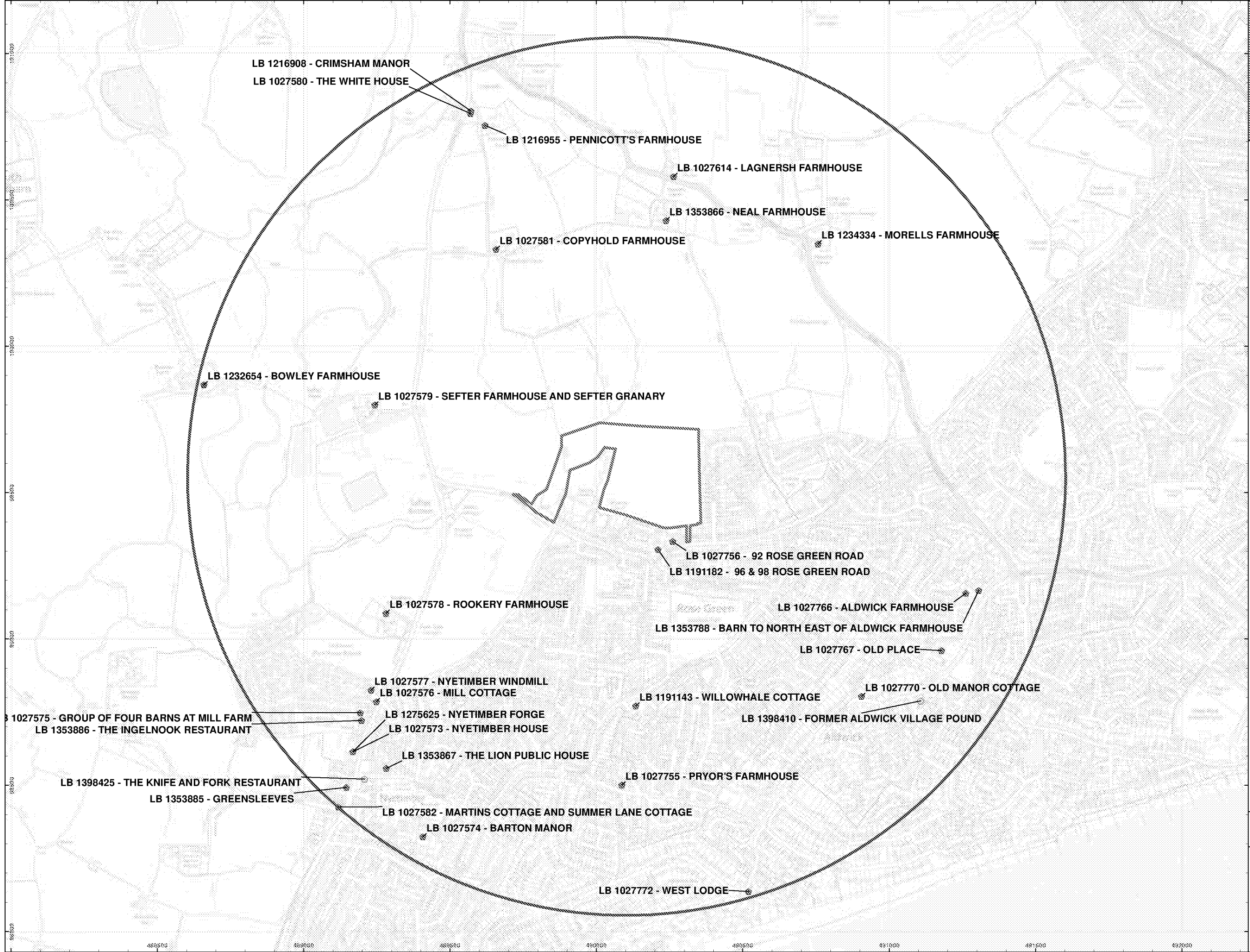


Figure 2: Summary of cultural heritage designations (data from West Sussex HER)



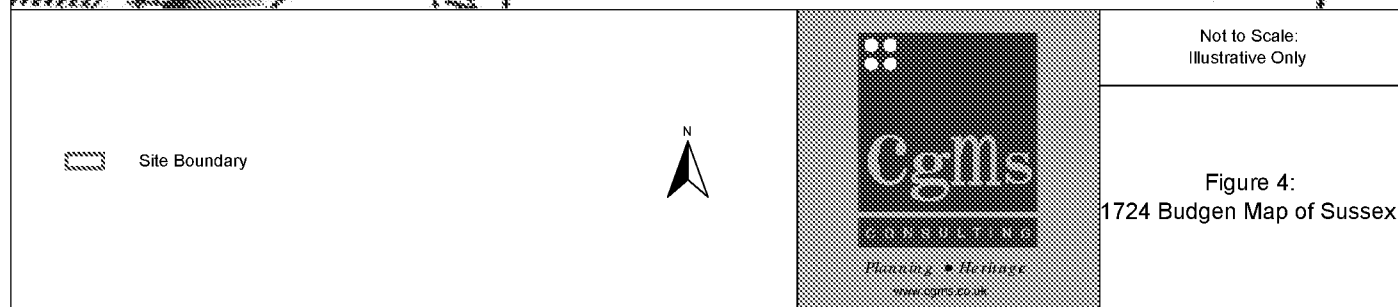
- Site Boundary
- Search Radius 1.5km
- Designated
- Listed Buildings**
- Grade II*
 - Grade II
 - DeListed



Scale at A3: 1:12,000

0 400 m

Figure 3: Designated Heritage Assets within 1.5km of the Site Centre (data from West Sussex HER)





 Site Boundary



Not to Scale:
Illustrative Only

Figure 5:
1778 Yeakel and Gardner
Map of Sussex

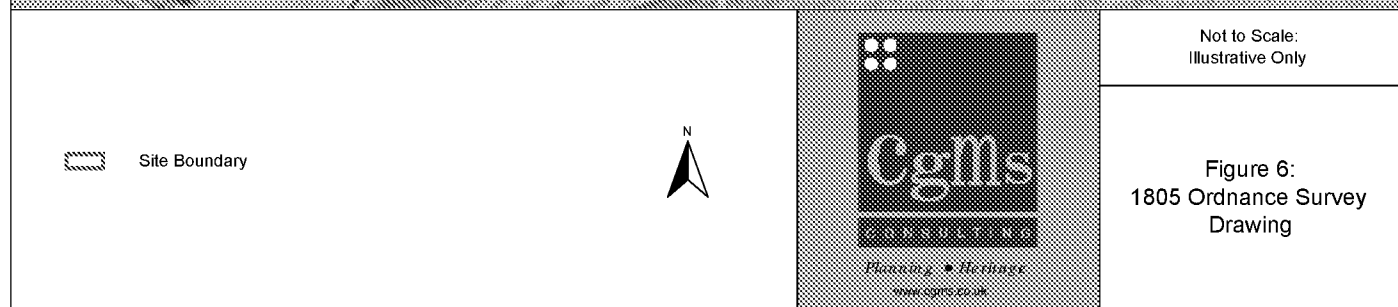
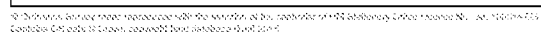




Figure 7:
1825 Greenwood and
Greenwood Map of Sussex





Site Boundary



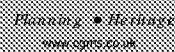
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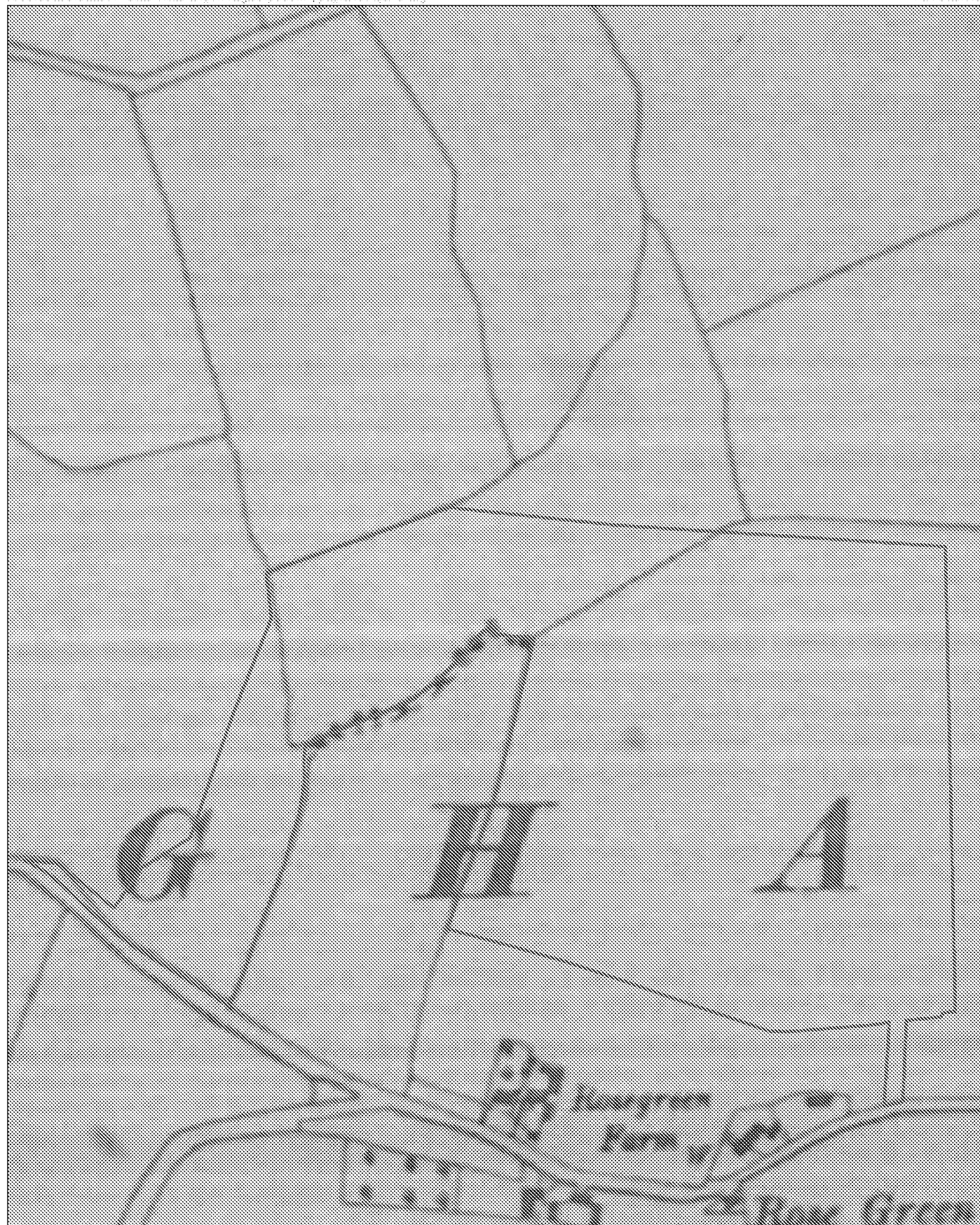
Not to Scale:
Illustrative Only

Figure 8:
1849 Pagham Tithe Map



Figure 9:
1875 Ordnance Survey





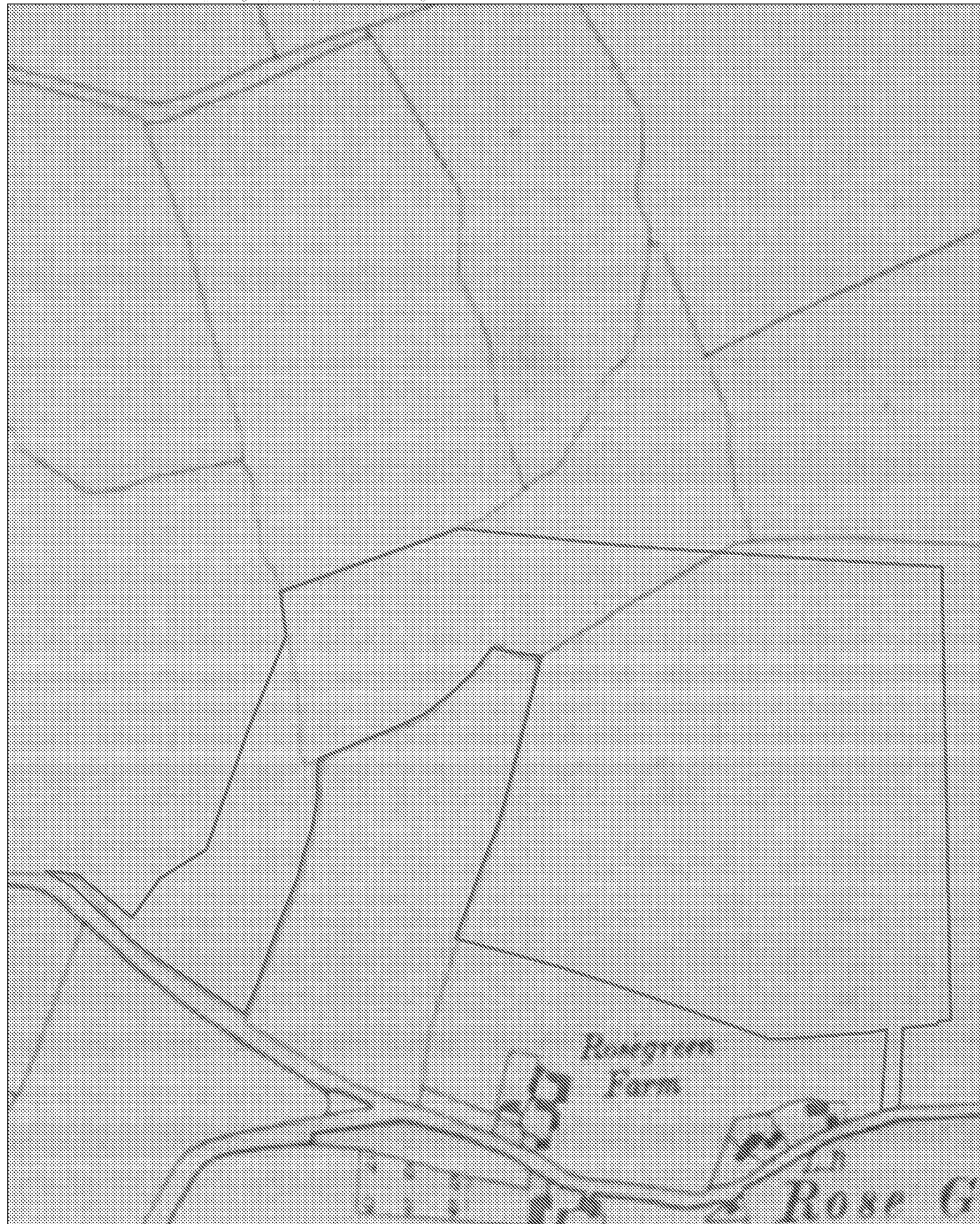
Site Boundary



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Illustrative Only

Figure 10:
1899 Ordnance Survey



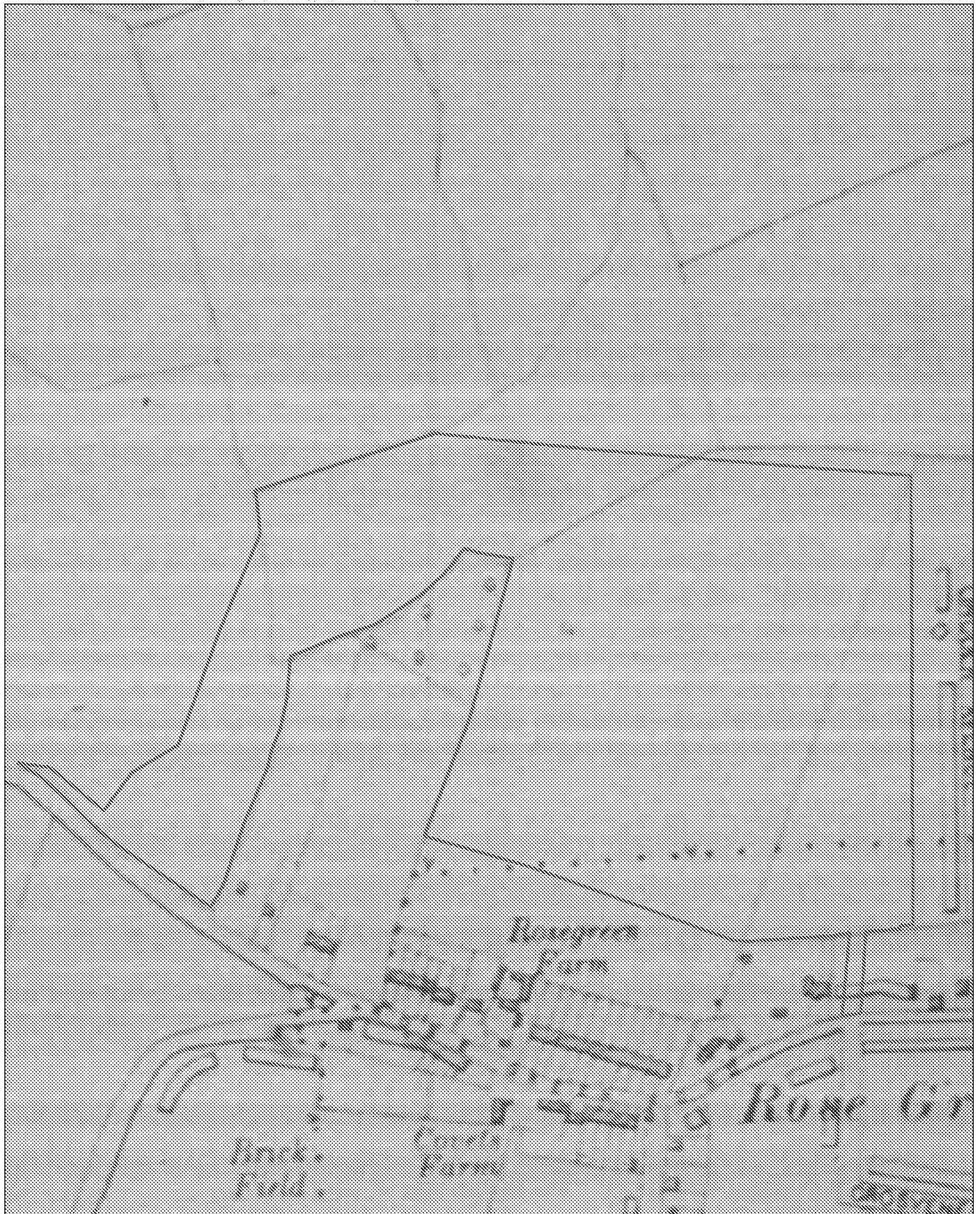
Site Boundary



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Not to Scale:
Illustrative Only

Figure 11:
1913 Ordnance Survey



 Site Boundary



Not to Scale:
Illustrative Only

Figure 12:
1938 Ordnance Survey



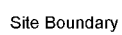


Figure 14:
2001 Google Earth View

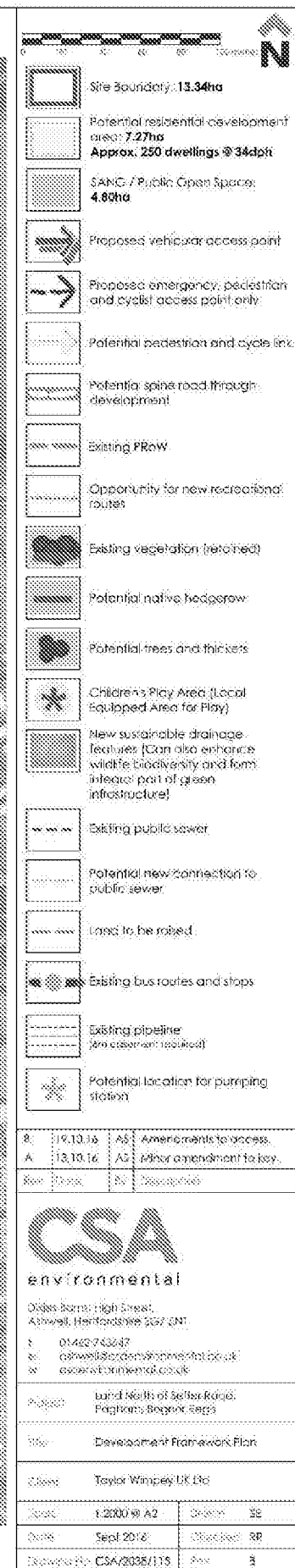


Site Boundary



Not to Scale:
Illustrative Only

Figure 15:
2015 Google Earth View

 Site Boundary

Not to Scale:
Illustrative Only

Figure 16:
Proposed master plan



Plate 1 View of the hall in southwest corner of site, facing northeast



Plate 2 View of west of site, looking north



Plate 3 Drain crossing east of site, looking south



Plate 4 View looking east from western boundary of site



Plate 5 View looking north from western boundary of site



Plate 6 View looking west from northeast corner of site



Plate 7 View looking south from northeast corner of site



Plate 8 View of southern site boundary looking toward Listed Buildings (92, 96 & 98 Rose Green Road)

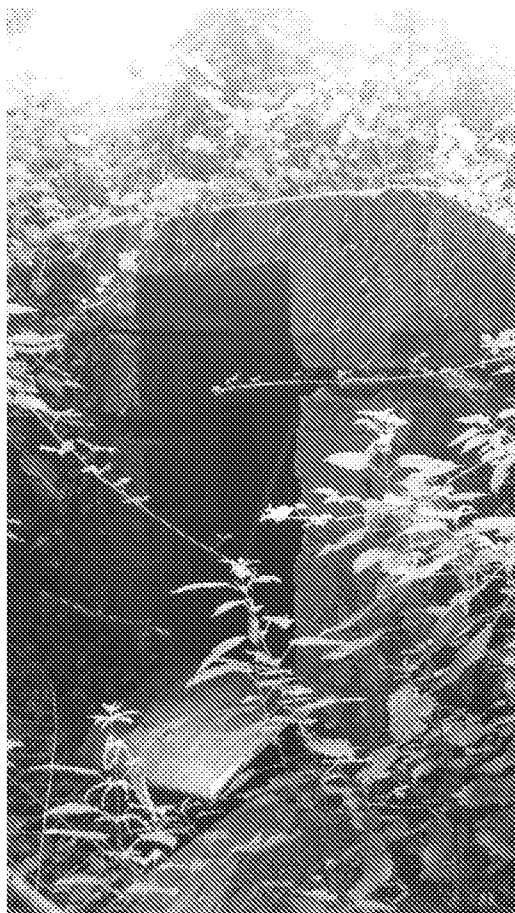


Plate 9 View of WWII infantry post in east of site, looking northwest

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