



Historic England

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Email: Charlotte.Hardy@arun.gov.uk
By email only

Our ref: 2016.01.14
Your ref: Ford NP SEA
Scoping HE
RLS
comments
Telephone 01483 252028
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14th January 2016

Dear Charlotte

Re: Ford Neighbourhood Plan Strategic Environmental Assessment Scoping Report

Thank you for consulting Historic England on the Scoping report for the Ford Neighbourhood Plan. As the government's advisor on planning for the historic environment I have focused on these areas of the Scoping report and on the baseline of historic environment data in particular.

It is clear from the SEA Scoping report and the Parish Council's material online that the community have already gone through a considerable process of plan evolution that has been constrained to an extent by the size of the allocation the parish is expected to deliver through the emerging local plan and the nature of the former Ford Airfield as the site that could realistically deliver this. Nevertheless, within the site there will be potential to consider alternatives and options for phasing, masterplanning and the provision of policy requirements (such as requirements for design, layout and landscaping) that should usefully be informed by the Strategic Environmental Assessment and we hope to see that there has been an iterative process between the further development of the plan and its specific policies and the evidence and assessment presented in the SEA.

As a general point, whilst we understand why the plan's early development has focused on the redevelopment of the former airfield we would still expect the SEA to cover the whole of the parish and appropriate surrounding areas. This is for two reasons. Firstly, to provide the evidence that, where the proposed development would or could result in negative impacts, that these could not be provided with less harm elsewhere in the parish. Secondly, to identify current or predictable environmental effects within the neighbourhood that could be influenced, either



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positively or negatively, by the plan options. Where the plan could provide beneficial effects it might be necessary to secure these through the plan policies to offset, or outweigh, potential negative impacts or 'harm'. As such, we would request that the historic environment baseline is expanded to include consideration of neighbouring areas, in particular Yapton Conservation area, as the large scale of development proposed is likely to result in indirect impacts to the historic environment (principally increased traffic) and impacts on views which will need to be considered in developing the outline masterplan and development management policies.

With regard to the assessment of the environmental baseline presented we would like to make a number of specific comments that we feel need to be addressed:

At 3.41 we disagree with the statement at 3.41 that the 'site' is located outside the setting of the Grade II Listed Atherington House. It is not clear whether this assessment has been based purely on a visual analysis, but our advice does point out that the setting of a heritage asset is also determined by other sensory experience of the asset and, therefore, assessment of setting should also include consideration of noise (or its absence), odour, dust and activity where these have an influence on the significance of the heritage asset. The assessment of the setting may also vary between seasons, for example when winter leaf fall increases the openness of landscapes and depends on the nature of the development that could affect it. Nevertheless, it appears from the mapping that the 'site's' boundary is in fact contiguous with the garden of the farmhouse. The argument in the scoping report is, in any case flawed, stating that the industrial buildings at the northern end of the site are seen from the curtilage of the listed property and negatively contribute to the property's significance. As such, at least part of the site must form part of the listed building's setting. Whether part of the site represents the farmland that, as a farmhouse, gave the building it's *raison d'être* and therefore contributes to its significance beyond providing a rural character would be a matter for further research, which is a need that should be identified in the Scoping Report.

We note that the emerging masterplan proposes providing a rural character setting to this building and others along Ford Lane by retaining open land as a paddock. The reasoning for this as a positive element of plan making to sustain the significance of a designated heritage asset should be explained in the Environmental Report, in order to justify the exclusion of this land from housing development.

The Scoping Report helpfully reviews the evidence of prehistoric and early Roman period archaeological remains that have been found within the 'site'. The presence of a multi-period landscape of archaeological remains spanning the Mesolithic to the early Roman period, and in particular the more extensive late Iron Age and Early Roman remains recorded, suggests the site does have potential to contain remains of more than local interest, contrary to the statement at 3.54. The proposals are, in fact likely to have effects on features of regional significance, with some, albeit



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limited potential for areas of nationally important remains to be affected. Whilst this does not preclude development that delivers substantial benefit that could potentially outweigh the harm resulting from the loss of non-designated heritage assets, this will need to be clearly expressed and opportunities to avoid harm clearly considered and, where practicable, pursued. Furthermore, a cautionary approach needs to be taken in the development of policy in the plan to ensure it meets the NPPFs requirement to secure the retention of remains of national importance if identified. We would recommend the community work closely with the District Council's archaeological advisor to develop a robust approach to the understanding and conservation of archaeological remains where these may be affected by development proposals and site allocations. The presence of important archaeological remains may require some flexibility in policy and masterplanning to allow nationally important remains (if identified) to be preserved in-situ and, ideally, interpreted to contribute to the development's sense of place. If their locations, condition, nature and extent can be more confidently identified during the plan making process this should influence the masterplan proposed.

Unfortunately, the scoping report has failed to identify or give suitable consideration to the significance of the airfield itself as a heritage asset or assemblage of heritage assets potentially of considerable importance. The history of use by the Royal Flying Corps and USAAF during WWI, and structures relating in particular to the event of 1918 could be of particular historic, archaeological interest, whilst the site has interesting associations with the history of civil aviation between the two wars. There may be potential for previously unidentified buildings or areas of national interest within the site, which therefore should be assessed through a robust built heritage survey, which should be identified as an evidence gap if it isn't currently available. Even relatively inauspicious historic airfield buildings may have a history that makes them of special local or national interest. Ideally, if buildings and areas are identified as having a particularly high importance for their significance, the plan should include proposals that ensure their retention and sensitive reuse. We note that the masterplans presented have sought to retain elements of the historic airfield layout (the runways and some areas of adjacent green open space). Demonstrating that this has been necessary to retain some of the site's historic interest would help to justify this layout. Again, we recommend working with the Council's historic buildings conservation advisor to develop evidence at a suitable level of detail to inform the plan.

The scoping report identifies the presence of part of the course of the Arundel and Portsmouth Canal but does not identify whether maintaining the integrity of the canal's route has been identified elsewhere as a priority. Maintaining the line of the canal is a policy in the emerging Local Plan, which is informed by the local plan evidence base, which should also be relevant to the neighbourhood plan.



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The existing and emerging local plans include a requirement to protect views of and from the South Downs National Park and Arundel Castle. It isn't clear from the assessment whether there is any potential for the proposal site to affect such views. Where further evidence gathering may be required to test any potential for impacts this should be identified as an evidence gap in the Scoping Report.

We note that the area is identified as having Low/Medium Capacity for landscape change in the Arundel Landscape Character Assessment, whilst the options present would result in considerable urbanising of the rural landscape and loss of separation between at least three settlements, requiring robust justification, where this is considered to be a harmful impact.

At 3.62 the scoping report appears to be making an assessment of the impact of development proposals, which it should not do at this stage. Indeed this suggests that alternatives will not be considered,

The SEA Framework does not provide sufficient clarity for assessment of the likely significant effects of the neighbourhood plan on the historic environment and heritage assets in particular. We would recommend including an additional SEA objective – “to conserve and enhance heritage assets in a manner appropriate to their significance” - to reflect the requirements of National Planning Policy. This may be different from sustaining the area's environmental integrity and may even result in either some loss of environmental integrity or ideally change that better reveals the significance of heritage assets. Given the scale of development and the presence of both designated and non-designated heritage assets in the proposed development area, we feel that this should be a clear SEA objective rather than a subset of another objective.

We hope these comments are of assistance to you but would be pleased to answer any queries you may have or to provide additional information if it can be of assistance.

Yours faithfully

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