



Historic England

SOUTH EAST OFFICE

Mr Gary Peck
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Direct Dial: 01483 252000

Our ref: P00561230

20 April 2017

Dear Mr Peck

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**GRAZING LAND SOUTH WEST OF FLYOVER STEYNING ROAD SHOREHAM-BY-SEA WEST SUSSEX
Application No. AWDM/1953/16**

Thank you for your letter of 10 March 2017 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Significance

The site lies adjacent to and within the vicinity of a number of designated heritage assets, some of which are highly graded and include the Church of St Nicholas (grade I listed), the Old Shoreham Bridge (grade II* listed), the Old Shoreham Conservation Area, Shoreham Airport (containing listed buildings and a Scheduled Monument) and Lancing College complex (grade I, II* and II listed buildings).

St Nicholas' Church is an important mid-12th century church with pre-conquest origins located on the northern edge of the conservation area. It sits within a verdant, spacious churchyard on rising land, set up above Steyning Road with attractive cottages below it. Its sturdy tower is a local landmark in both close views of the conservation area and also in longer views from across the river. The conservation area contains a number 18th and 19th century cottages (some grade II listed), including two inns, and forms the historic core of what was the rural parish of Old Shoreham. The buildings here have a small domestic scale, vernacular character and appearance and are loosely grouped around the church and along the roads.

Directly west of the church and conservation area, is Old Shoreham (toll) bridge, a



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timber shallow arched road bridge constructed in 1781 and which continued to carry traffic up until the 1970's, but is now for pedestrian/cycle use only. It forms a very attractive feature crossing the river. The bridge, church and historic buildings in the conservation area, together with the river and what remains of the undeveloped river plain, form a very picturesque grouping in views and have very high aesthetic value. This scene has been admired over the years for its beauty against the backdrop of pine trees and Downs and has been captured in paintings and photographs. In addition, the relationship of the church, conservation area and bridge to the open river plain is important in helping to understand their origins and that of the settlement of Old Shoreham and its historic development.

The site can also be seen within views towards and from the nationally important Lancing College. The college complex is set up high, on a beautiful exposed hill and dominates the skyline in views across the application site from the church, bridge, Old Shoreham Conservation Area and from the surrounding footpaths.

In addition, the application site can also be seen in views looking across the river towards the church and Downs from Shoreham Airport. The airport site contains the scheduled dome gunnery trainer, the grade II* listed terminal building and a grade II listed hangar. The hangar, terminal building and airfield have special group value for their functional interdependence. The dominance of the terminal building and strong airside building line are significant features of the airfield character in the flat, open, grassed river plain setting.

Impact

The application seeks outline consent for the erection of 52 dwellings on part of the flat narrow flood plain between the eastern side of the River Adur and the A283 Steyning Road. All matters are reserved apart from access and the re-alignment of the new Adur Tidal Wall Flood Defence. The Design and Access statement submitted with the application illustrates how the site would be developed which has been partly informed by the need to address the issue of flooding, and the requirement that no habitable rooms are below 5 metres, as well as providing noise attenuation to amenity spaces from the A27 flyover. The result is a scheme that is predominantly three storeys in height formally arranged in long uniform lines around the perimeter of the site.

As explained above, the undeveloped river bank character of the site forms part of the setting to a number of designated heritage assets, some very highly graded, and contributes to both their aesthetic and historic values. Its development, and particularly in the manner proposed, therefore has the potential to cause harm to these values and thereby to significance. In addition we are also aware that there are other large scale developments proposed on the other side of the riverbank and which will be visible in views from some of the same heritage assets affected by this proposal. There is therefore the issue of potential cumulative harm to the significance of the heritage



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assets.

Policy

There is a statutory requirement to have special regard to the desirability of preserving listed buildings, their settings and any features of special interest (ss.16, 1990 Act) and to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area (s.72, 1990 Act) which must be taken into account by the local planning authority when making its decision on any proposals for development where those interests would be affected.

The National Planning Policy Framework sets out that local planning authorities should require an applicant to describe the significance of heritage assets, including the contribution made by their setting; and that the level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance (para. 128). Our guidance 'Conservation Principles' explains that the significance of a heritage asset is based on its evidential, historic, aesthetic and communal values and that significance is determined not only by the physical fabric of a place but also by its appearance, its associations with other places and its relationship with its surroundings.

We consider 'setting' to be the surroundings in which an asset is experienced. Your authority should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance (para.137 NPPF). Historic England's recommended approach to the assessment of setting can be found in our Good Practice Advice Note, 'The Setting of Heritage Assets' (GPA 3). Settings of heritage assets which closely resemble the setting in which the asset was constructed are likely to contribute to significance.

If a proposal cannot be amended to avoid all harm, where it would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (para.134, NPPF).

While planning decisions should not impose architectural styles or stifle innovation through unsubstantiated requirements to conform to certain development forms or styles, it is proper to seek to promote or reinforce local distinctiveness (para.60 NPPF).

Position

Our initial view is that the proposal would be likely to have harmful impacts on a number of heritage assets. We acknowledge that the setting of the assets we have identified has been impacted by modern development to a degree, but as set out above, we think that there remains a great sense of an open landscape where important views are possible and historic connections can be made between assets



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themselves, and their landscape setting. We also acknowledge that this application is for outline planning consent only, however the level of information submitted in support of the proposals in relation to understanding such impacts falls very short of what should be required to be able to identify the potential levels of harm.

The heritage statement provided is extremely brief containing only an outline of the scope of the work that would need to be covered by a full heritage impact assessment that would be submitted at the reserved matters application. We do not think this approach is appropriate, as the outline application will establish the principle of development at this site, as well as numbers of dwellings, and a layout that is constrained by flooding and noise issues. The Landscape and Visual Impact Assessment does provide some assessment of visual impacts on heritage assets, (although we do not necessarily concur with these findings), however it does not provide an analysis of the significance of the heritage assets affected, as required by para 128 of the NPPF, nor does it explore how the site may contribute to that significance such as through the historic relationship between places or aesthetic considerations.

We therefore do not consider it appropriate to determine the application without a full and proper analysis of the impacts of the proposal on the significance of heritage assets being carried out and, especially as the site is within the vicinity of many assets, some highly graded. We would also expect cumulative impacts from other proposals within the vicinity to be also included within this assessment. We recommend that our published guidance on the "Setting of Heritage Assets" is used in the preparation of this and for there to be sufficient information to judge the levels of harm to the significance of designated heritage assets. The assessment should include accurate visual analysis (AVR's) to identify how the development will appear from important viewpoints to illustrate any levels of potential harm.

Recommendation

Historic England objects to this application without a full heritage impact assessment being provided to assess the potential impacts to designated heritage assets from the development. We do not think this application should be determined without this assessment being submitted.

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

Yours sincerely



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