



Historic England

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Cowfold Parish Clerk

Our ref:
Your ref:

[REDACTED]
Cowfold NP
Pre-
Submission
HE RLS
Comments

[REDACTED],
by email only

24th December 2019

To whom it may concern:

Cowfold Neighbourhood Plan Pre-submission consultation version

Thank you for consulting Historic England on the pre-submission version of the Cowfold Neighbourhood Plan Revision. Historic England is the government's advisor on planning for the historic environment, including the conservation of heritage assets and champion good design in historic places. As such we review only those parts of the plan that fall within our areas of interest, silence on other areas should not be considered to represent agreement.

We will restrict our comments to those new policy areas of the revised plan where we feel our interest would be affected.

Policy CNP03 Potters

The site assessment states that this site lies directly adjacent to a red graded Archaeological Notification Area and some distance from an amber ANA. According to the West Sussex Historic Environment Record (HER) online mapping, the site actually lies largely within the amber graded area – an area associated with a medieval potting industry – and adjacent to the red category area of the medieval settlement of Cowfold. According to the HER website Archaeological Notification Areas have been defined to show where archaeological heritage assets are either known or considered likely to be present. They define only areas with known potential and the absence of an ANA should not be regarded as meaning that no site of archaeological interest will be present. The boundaries of such defined areas are generally treated only as where potential has previously been identified and there is often potential for further associated remains to be found beyond such boundaries. As such, an adjacent area may indicate some potential for presence of associated remains.



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

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We note that the Site Assessment does not identify any potential impact for the proposed development of this site on the archaeological interest of these areas (in spite of the potential for impact on subsurface archaeological remains) or propose any mitigation for potential harm through loss of remains. We note that the Sustainability Appraisal fails to identify the ANAs as heritage assets or potential heritage assets that are present and consequently does not identify any potential impact or suitable mitigation. As such, I'm afraid, we consider both documents to be flawed at present and needing amendment. We note that the Sustainability Appraisal also identifies that the development site lies close to the Cowfold Conservation Area and within 25 metres of a listed building as negative impacts. The sustainability appraisal does not identify what the potential impact of the development on the significance of these assets is, how this impact has been taken into account in allocating this site, or what mitigation has been proposed to avoid or minimise these negative impacts. As such we also consider this document to be flawed and in need of amendment.

Where a potential site allocation affects a designated heritage asset, such as a listed building or conservation area (including effects for its setting), the impact of those effects should be considered in terms of any harm or benefit that could be provided to their significance, including but not limited to the significance that justifies their designation. Planning authorities should endeavour to ensure that they have sought to avoid or minimise conflict between the need to conserve heritage assets and any aspects of a proposal (such as a development). Where possible harm cannot be avoided within a development proposal, the possible benefits of the scheme will need to be weighed against the negative outcome or 'harm' that results to determine whether the development is justifiable. The NPPF is clear that "great weight" should be given to the need to conserve designated heritage assets in particular. In this 'weighing' exercise. In this case it is unlikely that the proposed developments would result in substantial harm to designated heritage assets but such impacts should be exceptional and are unlikely to be justified in many cases and it remains important that "great weight" is given to avoiding or minimising less than substantial harm.

The potential for impacts to non-designated heritage assets (such as sites recorded as ANAs) should follow a similar process, with a weight given to their conservation that is appropriate to their level of importance (the greatest weight being given to those that are demonstrably of national interest). In this case we can see that public benefits would include provision of safer school access, provision of a number of market and affordable homes and provision of some public open green space. These benefits should be weighed against the potential harm resulting from the development to both the designated and non-designated heritage assets after the process of site assessment and any measures within the allocation policy have been developed to avoid or minimise harm wherever possible. Where these benefits could be provided in a less harmful way, for instance through development of an alternative site, they may be given less weight.



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Where a site allocation could have effects for a heritage asset that is otherwise protected through national and local planning policy there is a potential conflict that reduces clarity for decision makers. In such circumstances it is necessary to provide guidance within the policy about how this conflict should be managed to avoid or minimise that harm and to ensure the benefits that are considered to justify residual harm are secured.

The development forms part of the setting of the Cowfold Conservation Area and, as part of the main approach to the area from the A272 is a prominent area that has a significant impact on its character and appearance. It will be appropriate to consider how siting and layout of development within the site, as well as the design of buildings and landscaping should take the potential impact of change to this approach and the connection between the village conservation area and its rural surroundings into account to minimise any impact. We recommend that bullet point k is amended to refer to the need to preserve or enhance the character or appearance of the conservation area and the contribution made by its setting.

It is necessary to consider how the site's archaeological interest should be investigated prior to the submission of a planning application to ensure that the design of development takes into account opportunities to preserve important remains in situ or to provide an appropriate record and interpretation before any remains are lost. As such we recommend an additional bullet point is added to the policy to read:

"The design of the development, including the layout of buildings and open space, is informed by a programme of archaeological investigation conducted according to a brief agreed with the Council's archaeological advisor and is designed to preserve remains of importance in-situ giving the greatest weight to any remains of national interest. Where the preservation of remains is not merited they should be recorded to appropriate level of detail prior to their loss and provision for interpretation of the site's past, as revealed made within the village either on site or at another suitable location."

This should ensure that even where evidence of the village's medieval past is lost as a result of development, it remains (and becomes more) accessible to the community. The village primary school could be an appropriate location for off-site interpretation of the archaeological interest of the site

We hope these comments are of assistance to the steering group but would be pleased to answer any queries relating to them.

Yours sincerely

Yours faithfully



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[REDACTED]

Historic Places Adviser (South East England)
Historic England
Guildford

[REDACTED]

[REDACTED]



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