



Historic England

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11th August 2016

Dear Valerie,

Boxgrove Neighbourhood Plan SEA Screening Opinion

Thank you for your e-mail of 1st August advising us of the additional information submitted by the Boxgrove Neighbourhood Plan Steering Group and seeking our opinion on whether, in the light of this information, we are still of the opinion that the Boxgrove Neighbourhood Plan is likely to have significant environmental effects and therefore should be subject to a Strategic Environmental Assessment.

As you are aware, we previously noted that the one site proposed to be allocated for development is located in a potentially sensitive position between the Halnaker and Boxgrove Conservation Areas. We therefore suggested that perhaps further detailed assessment be undertaken to determine the likely degree and significance of any impact on the special interest of these two conservation areas that could arise from the development of this proposed site.

We also raised the issue of the potential for non-scheduled archaeological remains, particularly in an area as archaeologically sensitive as Boxgrove. We advised that the Historic Environment Record and James Kenny should be consulted on the proposed site at an early stage

Turning to the additional information now submitted, we note that consideration has been given to the intervisibility between the site and a number of designated heritage assets. Although the relationship between the proposed allocation and these assets, within the setting of which the site lies, was not a matter on which we specifically previously commented, it is an important consideration.

Unfortunately, the concentration on whether or not the heritage asset is visible from the site and vice-versa is not sufficient to fully address the potential impact of the proposed development on these heritage assets.



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Historic England has published advice on the setting of heritage assets: Historic Environment Good Practice Advice in Planning Note 3 (<https://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>) which recognises the importance of intervisibility, but also identifies a range of other factors that help determine the contribution of a setting to the significance of an asset, including noise, other “pollutants” (e.g. lighting) and activity.

This appreciation of the more complex factors to take into account when assessing significance and setting also applies to the Conservation Areas. Views out of the Conservation Areas, such as those identified in the Appraisals, are important, but it is also important to consider the wider setting of the Conservation Areas, including views towards, into and of the Areas e.g. from the National Park.

We are not, therefore, wholly convinced that the potential impacts of the proposed allocation on the special interest of the Conservation Areas (or on the significance of the other heritage assets in the locality) have been fully and properly assessed. We remain of the opinion, therefore, that the allocation of this site could have significant impact on the historic environment of Boxgrove.

As regards the potential archaeological impacts, we note the comments of James Kenny as reported in the further information. In particular we note his view that “The site will need to be investigated prior to development in order that structures and deposits of interest that might be present can be properly preserved, either in-situ or through archaeological excavation”. We would expect this requirement to be reflected in the policy allocating the site in the Neighbourhood Plan (a point we raised in our previous screening opinion).

However, although we have not been invited to comment on the Draft Plan itself at this stage, we note that there is no such requirement in Policy SA1. Therefore, the policy, as drafted, provides no protection for the possible archaeological interest of this site. We will be able to express our concerns on this point when we are consulted on the Draft Plan, but it is also relevant to the question of whether or not the Plan should be subject to formal, proportionate, Strategic Environmental Assessment in that James Kenny has identified a potential impact on non-scheduled archaeological remains that has not been avoided through the drafting of the relevant policy in the Plan.

We see one of the purposes of SEA as being to identify potential mitigation measures, and we would expect an SEA of the Plan, if undertaken, to identify pre-development investigation as mitigation for the potential impact of the development of this site on archaeological remains.

In summary, therefore, the submission of this additional information, whilst welcome, does not persuade us that the Plan should not be subject to a formal SEA. Indeed, James Kenny’s confirmation of the potential archaeological importance of this site, and the failure to safeguard this through the policy, as currently drafted, rather confirms our view that a proportionate SEA of the Plan **is** required.



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We would be happy to discuss this opinion with yourselves and/or the Neighbourhood Plan Steering Group and review this opinion in the light of those discussions or further information and a revised Policy SA1.

However, as you and the Neighbourhood Plan Steering Group are aware, one of the basic conditions that will be tested by the independent examiner is whether the making of the neighbourhood plan is compatible with European Union obligations (including under the Strategic Environmental Assessment Directive). The responsibility for ensuring that the Plan meets the basic conditions lies with the qualifying body and yourselves as the authority that will make the Plan if it passes the referendum.

Therefore, even if the Steering Group are confident that the Plan would not lead to any significant environmental impacts (with or without a change to Policy SA1 to reflect James Kenny's comments), the Group and yourselves may consider that it is prudent to undertake a proportionate (but compliant with the Environmental Assessment of Plans and Programmes Regulations 2004) SEA, if only to confirm that the Group is correct and the Plan would not be likely to lead to significant environmental effects. This is a matter that we leave to the Steering Group and yourselves.

We hope these comments are helpful.

Thank you again for consulting Historic England.

Kind regards,



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(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)

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