



Ms Arleta Miszewska
Havant Borough Council - Planning
Public Services Plaza
Civic Centre Road
Havant
Hampshire
PO9 2AX

Direct Dial: 020 7973 3739

Our ref: P01563558

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Dear Ms Miszewska

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

**LAND EAST OF, COLLEGE ROAD, PURBROOK, WATERLOOVILLE
Application No. APP/23/00488**

Thank you for your letter of 25 July 2023 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.

Summary

The proposed development site lies adjacent to the well-preserved remains of a Roman villa complex fronting the Chichester to Bitterne road. The scheduled archaeological remains sit well within the rural landscape that would have been evident at the time of their construction. The setting of the monument and its relationship with a prehistoric barrow to the south would be impacted by the proposed development. Attempts to minimise the harm have been made through design and some heritage benefits are proposed. However, the impact of the setting has not been fully presented and digitally rendered photomontages are required to fully assess the level of harm. Further details and improvements are also required as part of the balancing process which, once agreed, should be secured by condition within any permission your authority was minded to grant.

Historic England Advice

Significance of the Heritage Assets

The development is located immediately adjacent and/or close to three Scheduled Monuments:

- Roman villa and section of Roman road south-west of Littlepark Wood



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(NHLE: 1001859);

- Bevis's grave long barrow and early medieval cemetery site (NHLE: 1012831) and;
- Fort Purbrook, including covered way to the east (NHLE: 1001842 - also Grade II* listed).

Tower House (NHLE: 1303449 - Grade II) and the site of Farlington Redoubt (HER: 238457 - a non-designated heritage asset) are also sited nearby but will not be considered as part of this advice letter.

Roman villa and section of Roman road south-west of Littlepark Wood

Romano-British villas were extensive rural estates at the focus of which were groups of domestic, agricultural and occasionally industrial buildings. They were constructed throughout the period of Roman occupation, from the 1st to the 4th centuries AD, and provide a valuable index of the rate, extent and degree to which native British society became Romanised, as well as indicating the sources of inspiration behind changes of taste and custom. In addition, they serve to illustrate the agrarian and economic history of the Roman province, allowing comparisons over wide areas both within and beyond Britain.

The plan of the villa compound south-west of Littlepark Wood is largely derived from the geophysical survey and supporting evidence from the 2018 archaeological evaluation, with only one of the buildings having been subject of an antiquarian excavation in 1926. The 2018 work confirmed multiple phases of activity, ranging from the 2nd to the 3rd century AD.

The villa is located next to part of the Chichester (Noviomagus) to Bitterne (Clausentum) road, listed as Route 421 in Margary. Roman roads were engineered routes designed to be used by wheeled vehicles and to facilitate rapid communication across the empire using messengers on horseback. Most (but not all) were formed from a raised earthen embankment known as an agger formed from material derived from flanking drainage ditches. The agger was subsequently metalled. Roman roads frequently became the focus of settlement, industry and burials. The road survives to varying degrees along its length comprising various combinations of a metalled surface with roadside ditches close to the entrance to the villa complex, the metalled surface with an absence of ditches to the east and to the west only the ditches appear to remain. The road also survives partially above ground in the form of light earthworks to the western edge of the site.

Villas were often effectively working country estates, usually set within an agricultural landscape which formed the economy of the villa, and over which the villa estate had control. Associated landscape details such as roads and field systems are therefore an important part of the significance of villa sites, in that they help form an understanding





of the function and layout of these estates, and this is certainly the case for Campdown. The Noviomagus to Bitterne road would have been constructed prior to the development of the villa complex and would have been an important element in siting the original estate in the 2nd Century.

Bevis's grave long barrow and early medieval cemetery site

Long barrows were constructed as earthen or drystone mounds with flanking ditches and acted as funerary monuments during the Early and Middle Neolithic periods (3400-2400 BC). They represent the burial places of Britain's early farming communities and, as such, are amongst the oldest field monuments surviving visibly in the present landscape. Certain sites provide evidence for several phases of funerary monument preceding the barrow and, consequently, it is probable that long barrows acted as important ritual sites for local communities over a considerable period of time and almost certainly influenced the siting of the early medieval burials that have been identified close to the earthwork.

In this respect the wider open space surrounding this monument is a very important part of its significance. The prominence of burials on higher ground, views to and from the site, and special ritual significance of the landscape, are all factors that make up their setting, and help form an understanding of why the barrow and later burials were positioned on Portsdown.

Fort Purbrook, including covered way to east

Fort Purbrook is one of a group of forts built in the 1860s, known as the Portsdown Forts, whose purpose was to protect Portsmouth Harbour from a landward attack from the north. The Portsdown Forts were constructed specifically to fortify this strategic ridge such that it could not be occupied by an invading French force and used a base from which to bombard the harbour.

The open space around the Fort is an important aspect of its historic design and operation, as the field of fire. Whilst the extended areas of fire around the Fort have been subject to modern development, the mid and close range areas currently survive as open spaces, partly under use of the golf course, and some as grazing or integral parts of the main Purbrook site, and it is possible therefore to still understand and interpret the functionality of the Fort.

Impact of the proposals

The proposals comprise the construction of 628 new dwellings and new access onto College Road, along with landscaping, drainage, car parking and other associated works and infrastructure. The heights of the proposed structures ranges between 1 to 3 storeys.





The construction of new buildings and infrastructure are not proposed within the scheduling boundaries of any of the above-mentioned Scheduled Monuments. The development is, however, proposed to be sited adjacent to and south of the Roman villa and road, between this and the Bevis's grave long barrow and Saxon cemetery. It also falls within the field of fire of Fort Purbrook, albeit located further away from it than the other two heritage assets. A community orchard and children's play area are proposed adjacent to the east and west sides of the southern end of the monument boundary.

As such the impact predominantly concerns and incursion on the setting of the Scheduled sites. The rural setting and outlook of the villa estate will be compromised by the siting of residential properties and associated infrastructure, impacting its association with the surrounding topography and its geographical context. It also risks severing its association with other features within the historic environment, namely the scheduled Neolithic long barrow and subsequent early medieval cemetery. Perception of the continuation of human occupation and activity which pervades the prehistoric, Roman and medieval (and post-medieval) periods within this specific locality will be diminished through the imposition of modern development through its centre. This could cause harm to the significance of these monuments.

Current proposals to allow for some wilding within the Roman villa site could also cause harm as the growth of scrub and other vegetation could impact below ground archaeological remains and deposits. As such, this would have to be carefully managed.

Some minor harm would also be caused to Fort Purbrook, impacting its setting through development within its field of fire.

Policy Considerations

1979 Ancient Monuments and Archaeological Areas Act

The Roman villa and associated road, Bevis's Grave and Fort Purbrook are protected as a Scheduled Monuments under the 1979 Ancient Monuments and Archaeological Areas Act on account of their national importance and archaeological, architectural, historical and traditional interest.

Any works within them (even if delivering a positive effect) will require Scheduled Monument Consent (SMC). This is granted by the Secretary of State for Digital, Culture, Media and Sport (DCMS), in a process administered by Historic England.

DCMS Policy on Scheduled Monuments



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The DCMS document Scheduled Monuments and nationally important but non-scheduled monuments (October 2013) sets out Government policy on the identification, protection, conservation and investigation of nationally important sites and buildings for the benefit of current and future generations. It notes that in addition to their intrinsic value, scheduled monuments can contribute to our perceptions of cultural identity and provide unique opportunities for research, education, leisure and tourism, delivering social benefits and contributing to economic growth.

National Planning Policy Framework

One of the principal objectives of the National Planning Policy Framework (NPPF 2021) is the conservation of historic environment (paragraph 20).

Other relevant policies are summarised below:

- Heritage assets are an irreplaceable resource and should be conserved appropriately to preserve their significance and to allow the continued enjoyment of existing and future generations (Paragraph 189).
- A decision-maker should identify and assess the particular significance of the heritage assets that are affected by a proposal. They should take account of this assessment to avoid or minimise conflict between the heritage assets' conservation and any aspect of the proposal (Paragraph 195).
- Great weight should be given to the conservation of designated heritage assets. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alterations or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification (Paragraphs 199 and 200).
- Sustaining and enhancing the significance of heritage assets is also a key requirement (Paragraphs 197 and 206) that may form part of the balancing process.
- Where a development proposal will 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 (which, in relation to heritage, would constitute tangible heritage benefits) (Paragraph 202).

Local Planning Policy

Planning policy for the proposed development site is provided by the Havant Borough Council Local Plan, made up of the Local Plan (Core Strategy) adopted March 2011 and the Local Plan (Allocations) adopted July 2014. The Local Plan (Core Strategy).

Key policies include:



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- Local Plan (Core Strategy) Policy CS11 Protecting and Enhancing the Special Environment and Heritage of Havant Borough - which references both designated and undesignated heritage assets and;
- Local Plan (Allocations) Policy DM20 Historic Assets - which concerns development that conserves and enhances historic assets and details concerning the provision and content of Heritage Statements.

Site allocation

It should be noted that Havant are currently reviewing the Local Plan (Allocations) Policy in relation to the application site. It is not currently an adopted allocation.

Historic England have been consulted by Havant and provided advice with respect to the treatment of the historic environment. As a result of our recommendations a Heritage Statement and Setting Study (2023) was produced which would inform future allocations policy and development proposals affecting the site.

Key considerations highlighted in the report include:

- consideration of the villa's rural setting and its visual and associated relationship with the Long Barrow;
- the requirement for site sections and visualisations;
- a generous open viewing corridor between the site of the Roman villa and the prehistoric barrow and;
- a requirement for building heights not to exceed the lowest point of the villa's plateau.

Historic England's position

These proposals follow previous development proposals and associated planning application which we have commented on. During subsequent pre-application discussions with the current applicant, ways in which to minimise or avoid harm to the Scheduled Monuments were explored. Also discussed were potential heritage benefits which could be considered as part of the balancing process. Although areas of the new proposals respond to our advice, further detail and heritage benefit is still required (NPPF 189, 195, 197, 200, 202, 206).

Setting and views

The new proposals have endeavoured to site the main core of new housing away and to the south of the villa site (not enclosing it as was the case with the previous application). The submission also states that it has utilised existing topography alongside strategic choices on building heights, to lessen the visual impact from the





core of the villa complex. It should be noted that the northern edge of the development will still be very visible from the Roman road and obscure wider landscape views to the south of it (NPPF 199, 200).

The application references the creation of 'viewing corridors' from the villa site and the long barrow and medieval cemetery to the south, a positive step in attempting to minimise the harm. However, the visual interrelationship between the villa site and the barrow, post development, has not been clearly demonstrated. It is not apparent what precisely will be viewed and where, within the viewing corridor. Specifically, we require clarity on whether the barrow will be seen in glimpsed narrow views from the villa site or if it will be seen within the entirety of the tramlines. Fully rendered photo montages of the views from these points will be required in order to assess any impact and ensure the vantage point benefit is meaningfully achieved. The provision of kinetic views within the corridor, presented in a computer-generated video would likely demonstrate this most effectively. In line with the Havant Heritage Statement and Setting Study (2023), we would expect the scheme to afford a generous viewing corridor to retain a meaningful visual relationship between the villa and the barrow. Visibility towards the barrow from a section of the Roman road should also be provided (NPPF 197, 206).

It is noted that since our last pre-application discussions a community orchard and play area have been added to the proposals. These fall adjacent to and either side of the south area of the scheduled villa site and Roman road. The play area is one of two proposed next to the Roman road and although we are pleased to see that the intention is for them to be appropriately themed to the surrounding historic environment, we would question the need for two so close to the monument. Neither the additional play area to the east or the orchard are considered within the HIA which suggests they are late additions (supported by their non-inclusion on the design proposal figures within the HIA). Their setting impact (positive or negative) has not been considered in the assessment (NPPF 195), something that should be rectified.

Landscaping

A light touch approach is proposed for the area around the former villa site, in the form of maintained grassland, rewilding and mown paths. Careful consideration would need to be given over rewilding on the Scheduled Monument as certain vegetation and scrub growth can damage underlying archaeological features and deposits and, as such, would require significant maintenance to avoid harm to the significance (specifically the evidential value) of the site. It can also hinder our ability to ensure nefarious or illegal activity (such as digging or metal detecting) is not taking place. As such we would favour a more managed landscape, one that positively makes use of the space and celebrates, interprets, enhances and reveals the heritage asset (NPPF 197, 206).

This would interrelate well with the requirement for heritage benefits which can help





balance the harm caused to the significance of the monument due to the impact on its setting, from the housing development. We would suggest some imaginative interpretation including, in addition the panels that are already proposed, potentially marking out the villa buildings. Public art is proposed in the HIA but no details of this have been provided. We also have concerns over the inclusion of boulders for seating. These may cause confusion as they are suggestive of megaliths and the site here is Roman not prehistoric. Instead some high-quality benches would be more appropriate.

Marking of the Roman road is suggested through the use of mown grass areas and tree planting. Tree planting is proposed outside boundary of the Scheduled Monument, although care will still be required as the area is likely to be archaeologically sensitive. Consultation with the Hampshire County Council Archaeological Advisors will be required, and mitigation may be requested by them (NPPF 200).

It is noted that the trees along Roman road are not uniform/straight, reflected by the non-linear nature of the adjacent cycle link. This is not ideal and detracts from the original linear alignment of the Roman road. We feel this needs reconsidering so that the alignment of the mown path, the cycle track and the trees are clear and straight and define the historic route. It will be essential to verify the precise location of extant earthworks related to the Roman road on site, through a topographical survey, prior finalising the design. Poplar trees may be an appropriate species for the planting and may assist in illustrating the uniformity of this piece of Roman military engineering (NPPF 199, 200, 202).

As the mown path is integral to illustrating the location and alignment of the Roman road, it is clear that this will need to be regularly maintained, or this benefit will be lost. We would request that a land maintenance and management plan (also incorporating land within the Scheduled Monument - which will require consent) be conditioned within any permission your authority was minded to grant (NPPF 202).

Conclusion

Harm will be caused, specifically to the significance of the scheduled Roman villa and road, through an incursion upon its setting by the new housing development. The level of harm cannot be meaningfully assessed until the applicant has provided clear photomontages showing the proposed development from the villa site and demonstrated the nature and extent of the views that will be retained from it kinetically to the scheduled barrow site to the south.

Although steps have been taken to minimise harm through the design of the scheme and heritage benefits proposed, further work as outlined above is required to ensure this balances the harm that will be caused to the monuments.

To this end we would need to see some elements of the proposals further explored





and submitted prior to your determination of the application. Specifically:

- Digitally rendered photomontages and/or a computer rendered video demonstrating kinetic views within the viewing corridor as requested above;
- Further information on and assessment of the impact of the community orchard and additional play area upon designated and undesignated heritage assets;
- A detailed landscape management and maintenance plan which focuses on the heritage assets, to be agreed with Historic England;
- A heritage benefits statement which commits clearly the extent and nature of all such benefits and enhancements that will be provided as part of the scheme, to be agreed with Historic England;
- A redesign of the alignment of the trees and cycle path so that they more accurately reflect and define the alignment of the Roman road.

It would be our expectation that once a landscape management and maintenance plan and heritage benefits statement have been agreed and submitted with the application, that the commitments defined in them should be secured by condition within any permission you were minded to grant.

We would note that any works within the scheduled area would require Scheduled Monument Consent (SMC) and that this should be discussed with Historic England at the earliest opportunity.

Finally, we trust that the Havant's Heritage Statement and Setting Study (January 2023) will be used as evidence to inform determination of the current proposal, where archaeological impacts clearly represent a relevant material consideration.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 189, 195, 197, 199, 200, 202 & 206 of the NPPF.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700

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Historic England

Iain Bright

Inspector of Ancient Monuments

E-mail: iain.bright@HistoricEngland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700

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