



Mr Mike Bleakley
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Direct Dial: 0207 973 3637

Our ref: P01344550

3 February 2021

Dear Mr Bleakley

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

**LAND ADJACENT TO A27 COPSE FARM TANGMERE ROAD TANGMERE WEST
SUSSEX
Application No. 20/02893/OUT**

Thank you for your letter of 5 January 2021 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

Following discussions with you, this letter supersedes our letter of 25 January.

This is an outline application for a mixed use development of up to 1,300 homes, a village centre, community facilities, a school, and open space and green infrastructure on an allocated site. The development lies immediately to the west of St Andrew's church which is a grade I listed medieval church that sits on the western edge of Tangmere. The building is significant for its historic and evidential value as an outstanding example of a medieval church with later alterations set within an open rural landscape. It comprises of a 13th century chancel, 17th century nave and broached shingled spire, all of which are relatively unaltered and little restored.

Records indicate that the current site of St Andrew's Church has been dedicated to St Andrew since c.680 AD. It is thought that the medieval village developed around the church with fields to the west and south providing pasture indicative of a manorial arrangement with agricultural landscape at the centre of the village.

The later medieval and post-medieval development of Tangmere shifted to the



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northeast of the church where modern development is found today. This has allowed the retention of open countryside to the northwest, west and south of the church, which today make up its setting. The predominantly flat landscape surrounding the church affords significant long-distance views to Chichester Cathedral and St Andrew's Church, Oving and contributes to the site's strong open rural character.

St Andrew's Church sits within the Tangmere Conservation Area. The Tangmere Conservation Area Character Appraisal and Management Proposals (approved December 2014) describes St Andrew's Church as the most important building within the Conservation Area, contributing to the conservation area's special architectural and historic interest, the character and appearance of which it is desirable to preserve and enhance.

We provided comments to the masterplan application on 4 December 2019 in which we did not object in principle to appropriate development here. However, we did consider that development in this location would cause less than substantial harm to the significance of the St Andrew's Church and we raised concerns about the lack heritage assessment.

The application has an Environmental Statement which includes a cultural heritage chapter and a townscape, landscape and visual assessment. A heritage assessment and archaeological evaluation report have also been submitted as appendices. We do not wish to comment in detail on the impacts to archaeology, as we note that you have received advice from Chichester District Council's archaeological advisor. However, if archaeological remains of national significance are found, we would be pleased to advise further.

We agree with the assessments of the cultural heritage chapter which state that the church of St Andrews Church has a 'rural and tranquil character' that has a 'direct relationship with the agricultural land to the west', and that this open, rural and agricultural setting is of high value to the church's significance.

Development on the proposal site would remove most of the rural setting of the church and alter its position on the edge of Tangmere. The proposed houses closest to the church are likely to be visible from the church and from approaches to it. This loss of rural setting and St Andrew's position on the periphery of the village, will cause less than substantial harm to the church's significance. We therefore agree with the Environmental Statement which concludes that there is likely to be 'a direct, permanent, long-term, adverse effect which is considered to be moderate to major' on



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St Andrew's Church Tangmere.

It is difficult to accurately assess the level of harm further as the proposal is at outline stage. In our previous comments for the masterplan application, we noted that visualisations would likely be required. We think that visualisations from the green areas and new housing, as well as from the church and churchyard towards the new development are also needed to fully understand the impacts of the proposals.

These impacts notwithstanding, we note that it is proposed to mitigate harm caused to the significance of the church and conservation area by changes to its setting through design and landscaping details. The illustrative master plan proposes green space adjacent to the church which we agree will help reduce the impact of the development on the setting and consequently the significance of the church. However, we think that there still will be a degree of harm as these areas will be designed for formal sports activities, which will not retain the original agricultural character. We note that the area allocated to parkland is planned to include wildflower meadows and minimal planting. We think that this would reduce the harm to the church as it would retain some of its rural setting. However, we stress that it is key that the area remains as informal as possible to mitigate the harm.

The plans indicate that the housing closest to the church and fronting the open countryside will be lower in height and density to minimise the harm to the church and wider area. We welcome this approach and suggest that the quantum and design of the housing references the existing nearby built form. We think that these liminal areas require careful consideration when at the detailed planning stage, so that the rural, tranquil character of the church is maintained.

Regard has also been made to mitigate the harm to the historic environment by creating long views out into the wider landscape from open spaces and green viewing corridors, including views from St Andrew's Tangmere to Chichester Cathedral and St Andrews Oving, as well as towards Halnaker windmill. We are also pleased that the central community park will preserve part of the former Roman settlement in-situ, and that the historic use of the site will be threaded through the design, for example by creating a network of grass atriums which will explain the significance of the Roman site.

The NPPF advises local authorities to look for ways to avoid or minimise harm to heritage assets when assessing proposals (paragraph 190). Furthermore, local planning authorities should take account of the desirability of sustaining and enhancing



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the significance of heritage assets, and the desirability of new development making a positive contribution to local character and distinctiveness (paragraph 192).

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater that weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance (paragraph 193). Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should require clear and convincing justification (paragraph 194). If your council is satisfied that the harm has been sufficiently minimised and that any remaining harm can be justified, then this harm should be weighed against the public benefits of the proposal (paragraph 196).

Historic England recognises the efforts that have been made to mitigate some of the harm to the setting of the church, however some level of harm would still remain as a result of the development.

We are keen to ensure that all potential harmful impacts on the significance of the church are fully considered under the terms of the NPPF. We therefore recommend that visualisations are prepared to fully understand the impacts of the proposal.

Following this assessment, your Council will need to decide whether further mitigation is required to avoid or minimise any harmful impacts, as required by paragraph 190 of the NPPF.

Any harm that remains should be clearly and convincingly justified (paragraph 194) and then balanced against the public benefits (paragraph 196)

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 190, 194 and 196 of the NPPF.



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Historic England

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. And section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or 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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