

**Recommendation Report for Approval of Details Reserved by Condition**

**REF NO:** P/40/20/DOC

**LOCATION:** Land North of Sefter Road & 80 Rose Green Road, Pagham

**PROPOSAL:** Approval of details reserved by condition imposed under ref P/134/16/OUT relating to Condition Nos 9 - arboricultural method statement, 15 - ecology, 20 - employment & skills plan, 28 - energy conservation, 30 - archaeological, 32 - noise, 33 - electric vehicle charging and 34 - retention of WW2 Infantry section post

**SITE AND SURROUNDINGS**

**DESCRIPTION OF APPLICATION** This application seeks approval of details reserved by conditions

9 – Arboricultural Method Statement  
15 - Ecological Protection & Enhancement Plan  
20 – Employment and Skills Plan  
28 – Renewable Energy Strategy  
30 – Programme of Archaeological Work  
32 – Noise Assessment  
33 – Electric Vehicle Charging Strategy

...and the partial discharge of condition

34 – WW2 Infantry Section Post Retention Strategy.

**This report deals solely with the partial discharge of condition 34.**

**RELEVANT SITE HISTORY**

P/134/16/OUT Outline application for the development of up to 280 dwellings (including affordable homes), land for a replacement scout hut, land for an Ambulance Community Response Post Facility and land for either a 1FE primary school or care home. Provision of a primary vehicular access from Sefter Road and demolition of No. 80 Rose Green Road and creation of a pedestrian and emergency only access. Provision of Public Open Spaces including associated children's play areas, landscaping,

drainage and earthworks. This application also falls within the parish of Aldwick

Approve Conditionally 15-10-2019

P/24/20/RES

Approval of Reserved Matters pursuant to condition 1 (Reserved Matters details), condition 6 (Design Code Masterplan) and condition 7 (landscaping and layout details) following the approval of Outline planning permission P/134/16/OUT for the erection of 280 dwellings, (including affordable homes), replacement scout hut & Ambulance Community Response Post Facility; provision of a primary vehicular access from Sefter Road; demolition of No. 80 Rose Green Road & creation of a pedestrian & emergency only access; provision of Public Open Spaces including associated children's play areas, landscaping, drainage & earthworks. This application also lies within the parish of Aldwick. This site falls within the Pagham North SD2, CIL Zone 1 (Zero Rated).

At the time of preparing this report, this application has not yet been determined.

## REPRESENTATIONS

REPRESENTATIONS RECEIVED:

PAGHAM PARISH COUNCIL; None received

ALDWICK PARISH COUNCIL; None received

Four letters of objection have been received raising the following specific concerns:

- Surface water flooding;
- Protection of habitat for wildlife;
- Traffic congestion;
- Inadequate infrastructure for education, health and police services; and
- Too much new development in the area.

One of the letters sought to apply all of the representations on the reserved matters application (P/24/20/RES) in the same way to this application.

## COMMENTS ON REPRESENTATIONS RECEIVED:

None of the points raised are material to Condition 34, which is the subject of this report. Consequently, there is no need to consider them any further.

## CONSULTATIONS

## ADC CONSERVATION OFFICER

The current application includes a written scheme of Investigation for an Archaeological Evaluation and Historic Building recording, which only sets out how the building is to be recorded. However, it is noted that paragraph 3.2 of the document states that the aim of the historic building recording is to create a record of the infantry section post as existing, prior to any future refurbishment work, so that the latter is fully informed by an understanding of the historic fabric.

Therefore, at present, it is considered that the written scheme of investigation for the recording of the pillbox offers an acceptable first stage in the production of an appropriate programme for the structure's retention and interpretation.

## ADC ARCHAEOLOGY ADVISOR

I consider the written scheme of investigation for the recording of the pillbox outlines a suitable preliminary to the formulation of an appropriate programme for its retention and interpretation, and that condition 34 may be partially discharged.

### **COMMENTS ON CONSULTATION RESPONSES:**

The consultation responses are noted and are addressed in the Conclusions section of this report.

## **POLICY CONTEXT**

### **DEVELOPMENT PLAN POLICIES**

Arun Local Plan 2011-2031: HER SP1 - The historic environment

### **PLANNING POLICY GUIDANCE**

National Planning Policy Framework (NPPF)  
National Planning Practice Guidance (NPPG)

## **CONCLUSIONS**

Outline Planning Permission (P/134/16/OUT) was granted on 15 October 2019. The permission was granted subject to 34 conditions and a s.106 agreement. Condition 34 states:

*“Prior to the commencement of development, a statement shall be submitted which will provide details of how the WW2 Infantry Section Post will be retained on site and integrated as part of the proposals. The development shall be carried out in accordance with the approved statement, unless otherwise agreed in writing by the Local Planning Authority.”*

The reason for the condition reads:

*“To preserve the significance of the non-designated heritage asset in accordance with Policy HER SP1 of the Arun Local Plan and paragraph 197 of the National Planning Policy Framework and to ensure that historic building feature is protected and preserved. It is necessary for this condition to be pre-commencement to avoid any harm to the significance of the non-designated heritage asset.”*

Policy HER SP1 of the Arun Local Plan 2011-2031 seeks to conserve and enhance non-designated heritage assets and their settings in a manner appropriate to their significance and contribution to the historic environment. Development that is likely to prejudice non-designated heritage assets, including their settings, will be refused.

Paragraph 16.1.11 of the Local Plan includes the definition of setting from the NPPF, being *“the surroundings in which a heritage asset is experienced”*. The paragraph adds that *“Careful management within the surroundings of heritage assets is key as it makes an important contribution to the quality of places”*.

Paragraph 197 of the NPPF states:

*“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”*

The application is supported by two significant reports, namely:

- *“Written scheme of investigation for an archaeological evaluation and historic building recording”*, dated April 2019 (revised January 2020 and revised February 2020); and
- *“Written scheme of investigation (level II recording) to inform a programme of retention and interpretation - Seftor Road Infantry Post, Pagham, Bognor Regis, West Sussex”*, dated 7 April 2020.

The former sets out a methodology for recording the WW2 infantry section post in the western part of the site. It will include a written record of the location, form, function, date and sequence of construction of the building. A measured plan and section of the structure will be included together with any existing drawings. A photographic record will also be made, including general external and internal views of the structure, with detailed views of any fixtures or architectural elements.

The latter report explains that the level of analysis and recording will be equal to that of an Historic England Level 2 survey, suitably enhanced and adapted to the requirements of the site with an appropriate degree of description, photography and use of annotated survey drawings. It proposes that the main output will be a report with embedded photographs in pdf format (backed up by hard copies of the report and an archival DVD of the whole photographic survey if requested). It adds that the report will be presented to the West Sussex Archaeological Advisory Service for approval, prior to being deposited with ADS-easy (Archaeology Data Service – an accredited digital repository for heritage data in the UK).

The structure is currently understood to be heavily overgrown and largely inaccessible. Consequently, it is not possible to implement the work until the requirements of the ecological protection and enhancement plan (to be approved under Condition 15) have been implemented. Hence, the application is for the partial discharge of Condition 34 only. Once the ecological works and building recording have been carried out, the applicant will be able to set out the precise scope of the retention and submit their statement for approval, which will ensure the preservation of this feature.

It is considered that the written scheme of investigation set out in these two reports will provide a suitable programme for recording the significance of the existing building and its setting to inform its retention on the site. The proposed programme of work is considered to accord with Historic England's Good Practice Advice note (GPA2), the NPPF (Paragraph 197) and the Arun Local Plan 2011-2031 (Policy HER SP1).

<b>RECOMMENDATION</b>
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That the written scheme of investigation be agreed to inform a statement explaining how the WW2 Infantry Section Post will be retained on the site and the partial discharge of Condition 34 be APPROVED accordingly.