



Bexhill, Fryatts Way, East Sussex

Archaeological Desk- Based Assessment

Prepared by
CSA Environmental

on behalf of
Gladman Developments Ltd

Report No: CSA/4648/02

January 2020

Report Reference	Date	Revision	Prepared by	Checked by	Approved by	Comments
CSA/4648/02	17/01/2020	-	RM	KK	RM	First Issue



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EXECUTIVE SUMMARY

Residential development is proposed at Bexhill, Fryatts Way, East Sussex, for which outline planning permission is sought.

CSA Environmental was instructed by Gladman Developments Ltd to undertake an Archaeological Desk-Based Assessment of the proposed development. This report provides a review of the known and potential archaeological resource.

There is no current evidence to suggest focused prehistoric, Roman or Early Medieval activity within the Site. Medieval settlement was likely focused at Bexhill c. 2km south-east of the Site. The Site may have formed part of the agricultural hinterland to settlement at Bexhill from the medieval period. Historic mapping and aerial photographs indicate that the Site remained in agricultural use through the 19th and 20th centuries, through to the present day. There is no evidence to suggest significant archaeological remains are likely to be present within the Site. This desk-based assessment should be considered sufficient to determine an outline planning application with regards to the below-ground archaeological resource.

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1.0 INTRODUCTION

- 1.1 This Archaeological Desk-Based Assessment (DBA) has been prepared by CSA Environmental on behalf of Gladman Developments Ltd, for the proposed development at Bexhill, Fryatts Way, East Sussex (hereafter 'the Site'). Residential development is proposed at the Site, for which outline planning permission is sought.
- 1.2 This DBA provides a review of the known and potential archaeological resource.
- 1.3 The Site occupies an area of c. 11.4ha and is located around central grid reference TQ 7236 0882, to the north of Bexhill. It consists of agricultural fields, horse pasture at the time of the Site visit (see Figure 1: Site Location Plan).
- 1.4 This DBA aims to:
 - determine, as far as possible from existing records, the nature, extent and significance of the archaeological resource within the Site;
 - assess the impact of the proposals on the archaeological resource.
- 1.5 This DBA has been prepared with reference to the guidelines in the Standard and Guidance for Historic Environment Desk-based Assessment issued by the Chartered Institute for Archaeologists (CIfA 2017) and the Historic England guidance Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2. Historic England (HE 2015a).

2.0 LEGISLATION, PLANNING POLICY & GUIDANCE

2.1 This assessment has been prepared in the context of current heritage legislation, planning policy and guidance, including:

- Ancient Monuments and Archaeological Areas Act (1979)
- Planning (Listed Buildings and Conservation Areas) Act (1990)
- English Heritage (now Historic England) *Conservation Principles, Policies and Guidance* (2008)
- Historic England *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning Note 2* (2015)
- Historic England *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)* (2017)
- The National Planning Policy Framework (MHCLG 2019)
- The Planning Practice Guidance (MHCLG 2018)

2.2 Further information is provided in Appendix B.

National Planning Policy

2.3 The National Planning Policy Framework (NPPF; MHCLG 2019) sets out the government planning policies for England and how they should be applied. Chapter 16: Conserving and Enhancing the Historic Environment, is of particular relevance to this report as it relates to heritage assets. Accompanying guidance is published in the Planning Practice Guidance (PPG; MHCLG 2018) which expands on how the historic environment should be assessed within the National Planning Policy Framework. Further details are provided in Appendix B.

Local Planning Policy

2.4 Local planning policy is contained within the Rother District Council Development Plan. Relevant policies relating to heritage are summarised in Table B.1 of Appendix B.

Guidance

2.5 Historic England have prepared a number of guidance documents including Good Practice Advice notes (GPAs) designed to provide supporting information on good practice and how national policy and guidance can be applied. These include GPA2, *Managing Significance in Decision-Taking in the Historic Environment* and GPA3, *The Setting of Heritage Assets*. Further details are provided in Appendix B.

3.0 METHODOLOGY

Sources of Information and Study Area

3.1 The report involved consultation of publicly available archaeological and historical information including heritage databases and documentary, cartographic and aerial photographic sources. The major sources of information comprised:

- the National Heritage List for England (NHLE), maintained by Historic England, for details of designated heritage assets;
- the Historic Environment Record (HER), for details of recorded heritage assets and previous archaeological works;
- the county Record Office for historic maps and documentary sources;
- online sources including the Local Authority website for information on conservation areas and the Environment Agency for LIDAR data;
- the Historic England Archives for historic aerial photographs; and
- a site walkover undertaken on 9 January 2020. Selected designated heritage assets in the vicinity were also visited at this time, as far as public access allowed.

3.2 HER data was obtained for a 1km buffer from the Site.

Assessment of Significance

3.3 A heritage asset is *“a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest”*. This interest may be archaeological, architectural, artistic or historic. Significance may derive from physical remains and also from setting, that is *“the surroundings in which a heritage asset is experienced”* (NPPF).

3.4 Heritage assets include designated heritage assets and non-designated heritage assets. Designated heritage assets include world heritage sites, scheduled monuments, listed buildings, protected wreck sites, registered parks and gardens, registered battlefields and conservation areas. Of these, world heritage sites, scheduled monuments, Grade I and II* listed buildings, protected wreck sites, and Grade I and II* registered parks and gardens are of the highest significance.

3.5 Non-designated heritage assets may include those identified by the local authority, such as local listings or assets recorded on a Historic Environment Record, or assets identified during the course of an

application (HE 2015). They are generally of lesser significance than designated heritage assets. However, non-designated archaeological assets may at times be of a significance commensurate to a scheduled monument, such as where they are not of a type suitable for designation or have not yet been formally assessed. Assessment of the significance of archaeological assets refers to criteria for scheduling monuments outlined by DCMS (2013), including period, rarity, documentation, group value, survival/condition, fragility/vulnerability, diversity and potential (DCMS 2013), as well as the Historic England Scheduling Selection Guides.

- 3.6 An assessment of significance will consider archaeological, historic, architectural and artistic interest of an asset, its fabric and its setting. In order to further understand significance, an assessment may also refer to the heritage values identified in Historic England's *Conservation Principles* (2008), namely evidential, historical, aesthetic and communal values. An assessment of significance should also seek to identify the nature, extent and level of significance for a particular heritage asset (HE 2015).

Assessment of Impacts

- 3.7 Change may preserve, enhance or harm the significance (value) of a heritage asset. In order to understand the impact of change it is necessary to first understand the significance of a heritage asset, and how this significance will be altered, both in terms of direct physical change, and change to setting (HE 2015). Assessment of impacts may also consider how an asset might be enhanced, or how loss of significance might be offset (ClfA 2017).
- 3.8 With reference to the NPPF, harm may be expressed in terms of 'substantial harm' or 'less than substantial harm'. Substantial harm "is a high test, so it may not arise in many cases...It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed" (PPG).

4.0 BASELINE HERITAGE CONDITIONS

- 4.1 This section reviews the recorded heritage resource within and around the Site with reference to the heritage databases, historic maps, aerial photographs and a site visit. A gazetteer of the recorded heritage resource is included in Appendix A and sites are illustrated on Figs. 2-3. CSA reference numbers, as detailed in the gazetteer, are referenced in bold in the text. The chronology used in preparing this report refers to the Historic England Periods List (HE 2015b). The main categories are summarised in Table 4.1.

Table 4.1 Periods

Palaeolithic	950,000 – 10,000 BC	Roman	43 AD - 410
Mesolithic	10,000 – 4,000 BC	Early Medieval	410 – 1066
Neolithic	4,000 BC – 2,200 BC	Medieval	1066 - 1540
Bronze Age	2,600 BC – 700 BC	Post Medieval	1540 – 1901
Iron Age	800 BC – 43 AD	Modern	1901 - present

Site Conditions

- 4.2 The Site comprises agricultural land, horse pasture at the time of the visit. Ground level is undulating, on a broadly west-facing slope (Plate 1).



Plate 1: View within the western area of the Site looking east.

Designated Heritage Assets

- 4.3 No designated heritage assets are recorded within or adjacent to the Site. Designated heritage assets in the 1km study area comprise Grade

II listed buildings. These includes four dwellings (Fig. 2, **LB1-4**) and the remains of a windmill (**LB5**).

Non-designated Heritage Assets

- 4.4 No non-designated heritage assets are recorded within the Site. Non-designated heritage assets in the wider area are considered in the period summaries below, where relevant.

Previous Archaeological Investigations

- 4.5 No previous archaeological works are recorded within the Site. An archaeological desk-based assessment is recorded at Moleynes Mead, c. 40m east of the Site (Fig. 2, **1**). For the associated planning application at Moleynes Mead, the archaeological advisor requested a condition for further archaeological works be attached to any planning permission granted (Planning application ref. RR/2017/2452/P).
- 4.6 A series of archaeological works including desk-based assessment, geophysical survey and watching brief, are recorded at Bexhill High Lower School, c. 150m to 600m east of the Site (Fig. 2, **2**; LP Archaeology 2008; ASE 2009). Works recorded features of possible prehistoric date (ASE 2009).
- 4.7 Other previous archaeological works in the area include building recording at the medieval Whitehouse Farm (Fig. 2, **LB4**), and desk-based assessments at Little Common and Down Road respectively (Fig. 3, **3** and **4**).
- 4.8 The results of these investigations are discussed further in the period summaries below, where relevant.

Geology, Topography and the Palaeoenvironment

- 4.9 The solid geology is mapped as Tunbridge Wells Sand Formation siltstone, mudstone and sandstone. No drift deposits are recorded (BGS 2020). The Site is located on undulating ground on a broadly west-facing slope. Ground level drops from approximately 30m aOD (above Ordnance Datum) in the eastern area of the Site, to approximately 15m aOD at the western Site boundary. A watercourse runs along the western boundary of the Site. No deposits of likely palaeoenvironmental interest are identified.

Prehistoric, Romano-British and Early Medieval

- 4.10 The findspot of a Bronze Age arrow head is recorded from Bexhill Down, c. 1km south-east of the Site (Fig. 2, **5**). The findspot of a 1st-century BC Mediterranean coin, a Tetradrachm of Tyre, is recorded c. 1km south-east of the Site (Fig. 2, **6**). Mesolithic, Neolithic and Bronze Age finds are

recorded in the wider area, to the south-east of the study area (LP Archaeology 2008).

- 4.11 An archaeological watching brief at Bexhill High Lower School recorded 15 shallow archaeological features many of which had charcoal-rich fills. Scientific dating was not possible and there were no associated datable artefacts. However, excavators suggested a prehistoric or Early Medieval date was possible (ASE 2009; Fig. 2, **2**).
- 4.12 No Roman period finds or features are recorded in the vicinity of the Site. Other than the undated possible hearths at Bexhill High Lower School, suggested as conceivably Early Medieval (see above; Fig. 2, **2**; ASE 2009), no Early Medieval finds or features are recorded in the vicinity of the Site.

Medieval, Post-medieval and Modern

- 4.13 The Site is located within the historic parish of Bexhill, the associated medieval settlement was likely focused around the Parish Church of St Peter c. 2km south-east of the Site. Grinses Farm, c. 400m west of the Site, is thought to be of medieval origin, potentially 13th century (Fig. 2, **7**). Whitehouse Farmhouse is of 16th century date (Grade II listed; Fig. 2, **LB4**). The post-medieval Ellerslie farmstead was located immediately north-east of the Site (Fig. 2, **8**; now re-developed). A number of later post-medieval/modern farmsteads and outfarms are recorded in the wider study area (Fig. 2, **9-19**). Moleynes Mead house, to the east of the Site, was established in the earlier 20th century (Fig. 2, **20**). Other post-medieval/modern sites recorded in the wider area include a brick and pottery woks (Fig. 2, **21**), a barracks at Bexhill Common (Fig. 2, **22**) and windmills (Fig. 2, **23, 24** and **LB5**).
- 4.14 The Site is located in the historic parish of Bexhill and area of the Site is depicted on a c. 1805 map of the Manor of Bexhill (not available for reproduction). This shows the Site situated across agricultural fields. A similar layout is shown on the 1843 Bexhill Parish Tithe map, excepting the loss of one internal boundary (Plate 2). The Tithe Apportionment Register details the Site as under the same ownership and occupancy as Broadoak Farmhouse to the south (now demolished). The focus of Broadoak Farm was re-established further west in the later-19th century (Plate 3). The Site remained in agricultural use through the later 19th and 20th centuries, through to the present day, with some loss of / alteration to internal boundaries.
- 4.15 A small building is visible in the south-eastern area of the Site on late 1950s aerial photographs, demolished by the later 1980s. This is labelled as a 'piggery' on 1950s Ordnance Survey mapping (not reproduced). Any below-ground remains of a mid-20th century piggery would not be of sufficient interest to comprise a heritage asset.



Plate 2: Extract from the 1843 Bexhill Parish Tithe map (green dashed line = additional field boundary recorded on map of 1805) (© The Genealogist © Crown copyright Images reproduced courtesy of The National Archives, London, England)

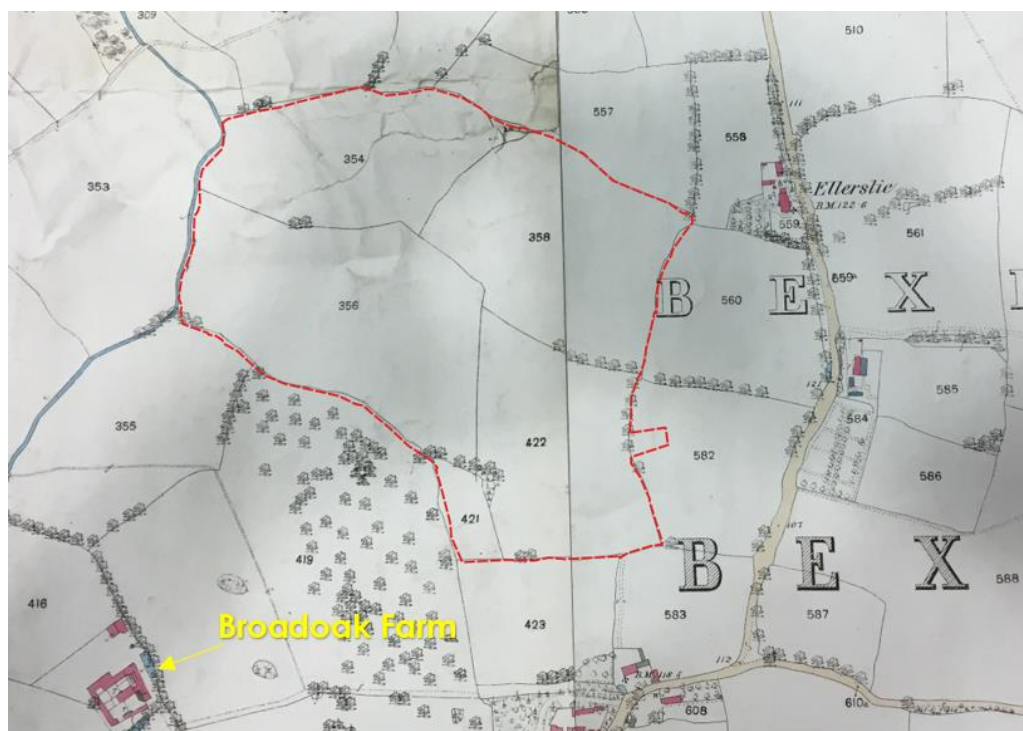


Plate 3: Extract from the First Edition Ordnance Survey map of 1873, 25" series

5.0 CONCLUSIONS

- 5.1 There is no current evidence to suggest focused prehistoric, Roman or Early Medieval activity within the Site. Medieval settlement was likely focused at Bexhill c. 2km south-east of the Site. The Site may have formed part of the agricultural hinterland to settlement at Bexhill from the medieval period. Historic mapping and aerial photographs indicate that the Site remained in agricultural use through the 19th and 20th centuries, through to the present day. There is no evidence to suggest significant archaeological remains are likely to be present within the Site. The above desk-based assessment should be considered sufficient to determine an outline planning application with regards to the below-ground archaeological resource.

6.0 REFERENCES

Bibliographic Sources

Archaeology South-East 2009. *A Further Archaeological Watching Brief at Bexhill High School, Bexhill, East Sussex*. Pdf. report available at https://archaeologydataservice.ac.uk/archiveDS/archiveDownload?t=arch-480-1/dissemination/pdf/archaeol6-57733_1.pdf [Accessed 14.01.2020]

BGS (British Geological Survey) 2020. *Geology of Britain Viewer*. Available at <http://mapapps.bgs.ac.uk/geologyofbritain/home.html>

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DCMS 2014. *Scheduled Monuments & nationally important but non-scheduled monuments*. Department for Culture Media & Sport

HE 2008. *Conservation Principles, Policies and Guidance*. Historic England (formerly English Heritage)

HE 2015. *Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning Note 2*. Historic England

HE 2015b. *Periods List (Historic England)*. Pdf available at <http://heritage-standards.org.uk/wp-content/uploads/2015/08/Periods-List-HE-FISH-WP.pdf> [Accessed 11.09.2018]

HE 2017. *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*. Historic England

LP Archaeology 2008. *Archaeological Deskbased Assessment of land at Gunter's Lane Bexhill*. Pdf report available at <https://apps.eastsussex.gov.uk/environment/planning/applications/register/documents/datawright%20saved%20documents/scannedinfo/planning/rr-2709-cc/archaeology%20gunters.pdf> [Accessed 14.01.2020]

MHCLG 2019. *National Planning Policy Framework*. Ministry of Housing, Communities & Local Government

MHCLG 2018. *Planning Practice Guidance*. Ministry of Housing, Communities & Local Government

Cartographic Sources

1788	Map of the Hundred of Bexhill, The Keep ref. CHR 18/10
1805	Map of the Manor of Bexhill, The Keep ref. AMS 5819/1
1873/8	First Edition Ordnance Survey mapping, 25" and 6" series
1899	Second Edition Ordnance Survey mapping, 25" and 6" series
1909/10	Third Edition Ordnance Survey mapping, 25" and 6" series
1930/37	Third Edition Revised Ordnance Survey mapping, 25" and 6" series
1854	Ordnance Survey mapping, 1:1,250 series

Aerial photographs

RAF/106G/UK/1725	10 SEP 1946
RAF/CPE/UK/1751	21 SEP 1946
RAF/58/186	17 FEB 1949
RAF/541/506	20 APR 1950
RAF/541/532	23 MAY 1950
RAF/3G/TUD/UK/149	16 APR 1946
RAF/58/2937	15 JUN 1959
RAF/541/599	27 JUL 1950
MAL/71137	16 SEP 1971
MAL/72019	23 MAR 1972
MAL/72010	08 MAR 1972
MAL/79047	12 DEC 1979
MAL/82005	04 APR 1982
OS/84027	14 APR 1984
OS/88128	22 MAY 1988

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Appendix A

Heritage Data Gazetteers

Designated Heritage Assets

CSA Ref.	NHLE Ref.	Name/Designation
LB1	1044282	Grade II listed building BEECH COTTAGE
LB2	1044246	Grade II listed building STONE COTTAGES
LB3	1044245	Grade II listed building 109, LITTLE COMMON ROAD
LB4	1252833	Grade II listed building 30, PEMBURY GROVE
LB5	1044283	Grade II listed building REMAINS OF THE DOWNS WINDMILL

HER data

CSA Ref./Summary	HER No.	HER Description
1	EES15798	Land at Moleynes Mead, Ellerslie Lane, Bexhill, East Sussex: Desk Based Assessment DESK BASED ASSESSMENT
2	EES15347	Land at Gunters Lane, Bexhill: Desk Based Assessment DESK BASED ASSESSMENT
	EES14462	Bexhill High Lower School, Gunters Lane, Bexhill: Watching Brief WATCHING BRIEF
	EES15488	Bexhill High Lower School, Gunters Lane, Bexhill: WB/GEO WATCHING BRIEF; GEOPHYSICAL SURVEY
	EES15489	Bexhill High Lower School, Gunters Lane, Bexhill: Watching Brief WATCHING BRIEF
	MES8643	Bexhill High Lower School, Gunters Lane, Bexhill, East Sussex: Hearths HEARTH
3	EES15880	Land at Hillborough House, Little Common: Desk Based Assessment DESK BASED ASSESSMENT
4	EES14728	Desk Based Assessment DESK BASED ASSESSMENT
5	MES65	Bexhill Down: BA arrowhead FINDSPOT
6	MES70	Sutherland Avenue: Greek coin FINDSPOT
7	MES19690	Grinses Farm: Medieval Farmstead (Large) FARMSTEAD; SETTLEMENT; FARMSTEAD
8	MES36625	West of Ellerslie Lane, Bexhill : C17-C18 farmstead (site of) FARMSTEAD
9	MES32860	Kite's Nest Farm, Bexhill : C19 Farmstead FARMSTEAD
10	MES32861	Kewhurst Farm, Bexhill : C19 Farmstead (site of) FARMSTEAD
11	MES32873	Turkey Farm, Bexhill : C19 Farmstead FARMSTEAD
12	MES32874	Clinchgreen Farm, Bexhill : C19 Farmstead FARMSTEAD
13	MES32875	Broad Oak Farm (Broadoak Farm), Bexhill : C19 Farmstead FARMSTEAD
14	MES32876	Hurchington Farm, Bexhill : C19 Farmstead FARMSTEAD
15	MES32891	Wat Clark's Farm, Bexhill : C19 Farmstead (site of) FARMSTEAD
16	MES33096	Broadoak, Bexhill : C19 Farmstead (site of) FARMSTEAD
17	MES33099	Woodsgate Park, Bexhill : C19 Farmstead FARMSTEAD
18	MES32859	Forest Barn, Bexhill : C19 Outfarm

		OUTFARM
19	MES33098	Field barn, Bexhill : C19 Outfarm (site of) OUTFARM
20	MES25903	Moleynes Mead, Ellerslie Lane: C20 Building BUILDING; HOUSE
21	MES23648	Lunsford: brick & pottery works BRICK KILN; POTTERY KILN
22	MES7975	Bexhill Common : C19 Barracks (site of) BARRACKS
23	MES17113	Bexhill: windmill mound WINDMILL; EARTHWORK
24	MES105	Pankhurst Windmill: C18 windmill WINDMILL; SMOCK MILL
See LB4	MES32890	Whitehouse Farm, Bexhill : Med Farmstead FARMSTEAD
	MES25113	Whitehouse Farmhouse, Bexhill : C16 Building BUILDING; TIMBER FRAMED BUILDING; CHIMNEY; OUTSHOT; SMOKE BAY; CHIMNEY; SMOKE BAY; CHIMNEY
	EES16581	Whitehouse Farmhouse, Bexhill: Historic Building Recording BUILDING SURVEY
See LB5	MES128	Bexhill Down Mill: C18 post mill (site of) POST MILL

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Appendix B

Legislation, Policy and Guidance

The **Ancient Monuments and Archaeological Areas Act (1979)** forms the principle legislation for designated archaeological sites. It relates to Scheduled Monuments and designated Areas of Archaeological Importance (the historic city centres of Canterbury, Chester, Exeter, Hereford and York). The 1979 Act does not contain any requirements relating to the setting of designated archaeological assets.

The **Planning (Listed Buildings and Conservation Areas) Act 1990** (the 1990 Act) sets out legislation relating to listed buildings and conservation areas. With regards to listed buildings, Section 66 (1) of the 1990 Act states that *"in considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority or, as the case may be, Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"*. With regards to conservation areas, Section 72 (1) of the 1990 Act states that *"...with respect to any building or other land in a conservation area...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area"*.

National Planning Policy Framework (2019) (NPPF) sets out the government planning policies for England and how they should be applied. With regards to the historic environment, Chapter 16: Conserving and Enhancing the Historic Environment highlights that heritage assets *"are an irreplaceable resource, and should be conserved in a manner appropriate to their significance"* (NPPF paragraph 184).

A heritage asset is defined as *"a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing)"* (NPPF Annex 2). Heritage significance is defined as *"The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."* Setting is defined as *"the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral"*.

With regards to the level of information to be provided, paragraph 189 of the NPPF states that *"In determining planning applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the*

assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation".

With regards to considering impacts the NPPF states that "great weight should be given to the asset's conservation (and the more important the asset, the greater the 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).

With regards to impacts to designated heritage assets, "Any harm to, or loss of...should require clear and convincing justification", substantial harm to or loss of designated heritage assets of the highest significance should be "wholly exceptional", and for grade II designated heritage assets should be "exceptional" (paragraph 194). Less than substantial harm to a designated heritage asset "should be weighed against the public benefits of the proposal" (paragraph 196). Footnote 63 clarifies that "non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets".

With regards to 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" (paragraph 197).

Where heritage assets will be lost as a result of development "Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact" (paragraph 199).

Advice on enhancing and conserving the historic environment is also published in the **Planning Practice Guidance (2018)** (PPG) which expands on how the historic environment should be assessed within the National Planning Policy Framework. This recognises that "the conservation of heritage assets in a manner appropriate to their significance is a core planning principle, Heritage assets are an irreplaceable resource and effective conservation delivers wider social, cultural and economic and environmental benefits".

Local Planning Policy is contained within the **Rother District Council Development Plan** including the 2006 Local Plan 'saved' policies. Local planning policies relevant to archaeology and the Site have been set out in Table B.1 below.

Table B.1. Local planning policy relating to heritage

Policy	Summary
Rother District Local Plan (adopted July 2006)	
GD1	<p>"All development should meet the following criteria: ...[points including] (viii) it does not prejudice the character, appearance or setting of heritage features, notably scheduled ancient monuments and sites of archaeological importance, listed buildings, conservation areas, registered historic parks and gardens, the registered battlefield at Battle, or other buildings and spaces of historic importance;..."</p>

The Historic England document **Conservation Principles, Policies and Guidance** (2008) sets out the recommended approach making decisions about the historic environment. It defines 'conservation' as *"the process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations"* (Principle 4.2). In order to understand significance, it recommends consideration of four heritage 'values', evidential, historical, aesthetic and communal in relation to a 'place'. Conservation Principles uses the term 'place' to mean *"any part of the historic environment that can be perceived as having a distinct identity"*. **Evidential value** *"derives from the potential of a place to yield evidence about past human activity"*, derives from the physical remains or genetic lines that have been inherited from the past. The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement". **Historical value** *"derives from the ways in which past people, events and aspects of life can be connected through a place to the present"*. Historical value is often 'illustrative', i.e. visible remains may illustrate an aspect of the past, or 'associative', i.e. may be associate with a notable family, person, event or movement. **Aesthetic value** *"derives from the ways in which people draw sensory and intellectual stimulation from place"* and may be associated with conscious design or 'fortuitous' development. **Communal value** *"derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory"*. Communal value is closely related to historical associative value and aesthetic value but tends to have additional aspects such as commemorative, symbolic, social or spiritual values. Conservation Principles recommends that assessment of significance should also consider setting and context. Setting being *"the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape"*, with the clarification that

"definition of the setting of a significant place will normally be guided by the extent to which material change within it could affect (enhance or diminish) the place's significance". Context relates to the "relationship between a place and other places". In the context of managing change to significant places Conservation Principles highlights that "Change to a significant place is inevitable, if only as a result of the passage of time, but can be neutral or beneficial in its effect on heritage values. It is only harmful if (and to the extent that) significance is eroded".

Historic England have prepared a series of advice notes including **Good Practice Advice notes** (GPAs) and **Historic England Advice Notes** (HEANs). The GPAs included **Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning Note 2** (2015) which includes guidance relating to the assessment of significance through understanding the nature, extent and level of significance.

The Historic England guidance **The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3** (Second Edition) (2017) (GPA3) details the recommended approach to assessing setting and potential harm to heritage assets through alteration to setting. This clarifies that *"setting is not itself a heritage asset...its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance"*. Historic England recommends that assessment of setting covers five broad steps:

- **Step 1:** Identify which heritage assets and their settings are affected.
- **Step 2:** Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.
- **Step 3:** Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it.
- **Step 4:** Explore ways to maximise enhancement and avoid or minimise harm.
- **Step 5:** Make and document the decision and monitor outcomes.

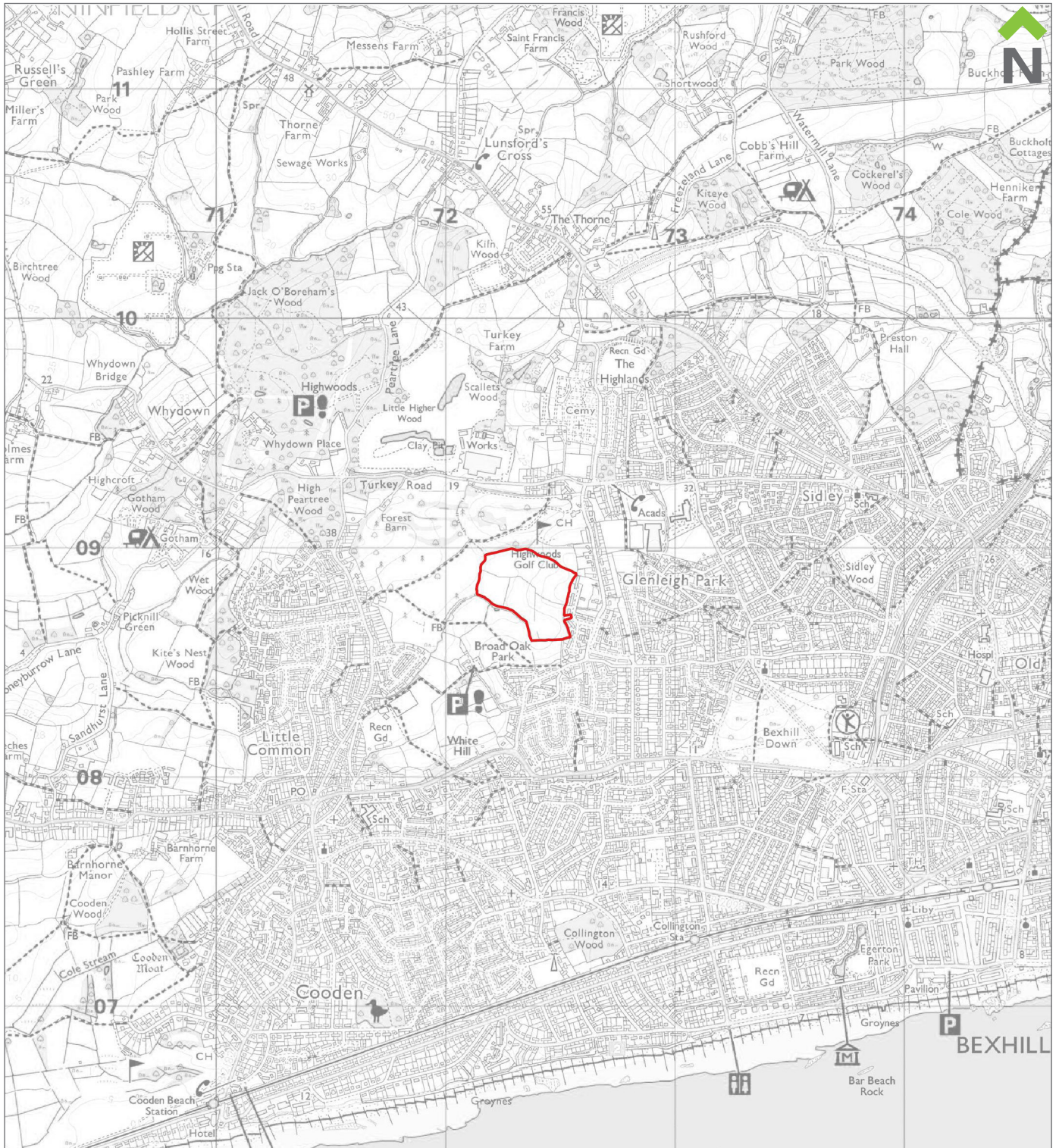
Step 1 should consider whether proposals have the potential to affect the setting of any heritage assets. Where appropriate this may utilise a 'search area' and 'Zone of Theoretical Visibility', as well as the nature of proposals. **Step 2** should consider the assets physical surroundings and its relationship with other heritage assets, intangible associations with surroundings and patterns of use, the contribution made by factors such as noise and smell, as well as the ways in which views allow the significance of the asset to be appreciated. A non-exhaustive checklist of potential attributes is given on page 11 of GPA3, including items such as: topography, aspect, definition of surrounding spaces, formal design, orientation, historic materials, greenspace, vegetation, openness,

functional relationships, history, change over time, surrounding character, views, intentional intervisibility, visual dominance, vibration, tranquillity, busyness, enclosure, land use, accessibility, patterns of movement, degree of interpretation, rarity, associations, artistic representations and traditions. **Step 3** is informed by step 2 and considers the effects of the proposed development with reference to factors including location, siting, form, appearance and permanence. Minimising harm in **Step 4** may include design alterations or the implementation of mitigating factors such as screening. **Step 5** includes documenting steps 1-4, but also reviewing a scheme following its implementation.

Appendix C

Figures

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Site Boundary



CSA
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Project Bexhill, Fryatts Way, East Sussex

Drawing Title Figure 1: Site Location Plan

Client Gladman Developments Ltd

Drawing No.
CSA/4648/100

Scale @ A4
1:25,000

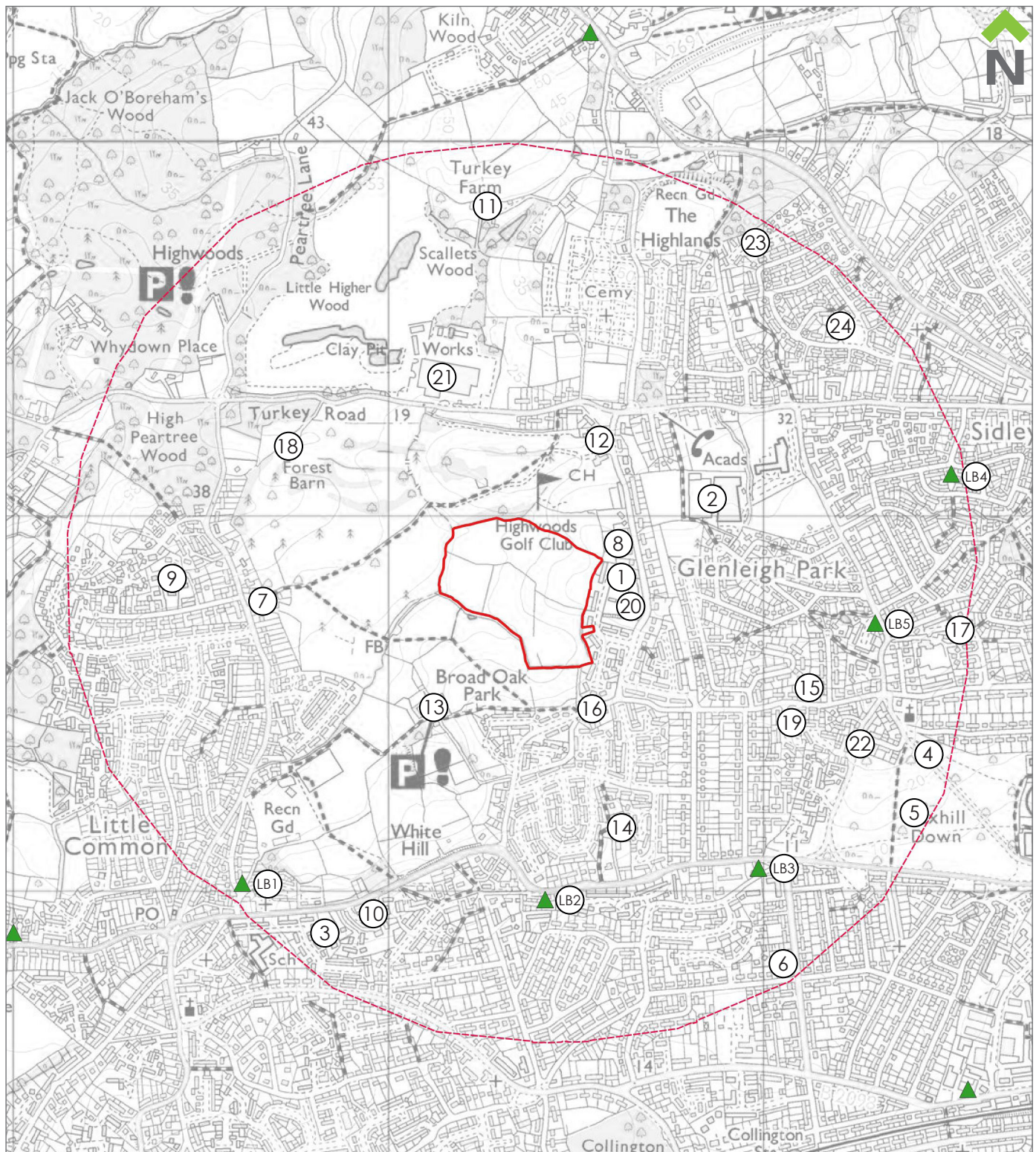
Date
January 2020

Rev
-

Drawn
TH

Checked
RM

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- Site Boundary
- Study Area
- ▲ Grade II Listed Building
- CSA Reference



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Project Bexhill, Fryatts Way, East Sussex
Drawing Title Figure 2: Recorded Heritage
Client Gladman Developments Ltd

Drawing No. CSA/4648/101	Rev -
Scale @ A4 1:15,000	Drawn TH
Date January 2020	Checked RM



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