

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 08 November 2023 23:07  
**To:** Planning  
**Subject:** Historic England advice on case PL00794297  
**Attachments:** \_HERef\_PL00794297\_L438775.doc

**Categories:** Consultations

Dear Mr Hawkes

I am writing in relation to the following:

SEA/SA/IIA: Strategic Environmental Assessment/ Sustainability Appraisal/ Integrated Impact Assessment  
West of Ifield Development  
[Case Ref. PL00794297; HE File Ref. ; Your Reference. EIA/23/0007]

Please find attached our advice in the form of a scoping opinion for you to take into consideration. Please note that this mirrors our previous advice regarding application EIA/20/0004.

Yours Sincerely

[REDACTED]  
Inspector of Ancient Monuments  
[REDACTED]

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Mr Jason Hawkes  
Horsham District Council  
Parkside  
Chart Way  
Horsham  
West Sussex  
RH12 1RL

Direct Dial: 0207 973 3630

Our ref: PL00794297

8 November 2023

Dear Mr Hawkes

**EIA/23/0007 - LAND WEST OF IFIELD, WEST SUSSEX  
REQUEST FOR EIA SCOPING: MIXED DEVELOPMENT**

Thank you for contacting us on 19 October 2023 regarding an EIA scoping opinion in relation to the above site. We treat such requests as pre-application advice. On the basis of the latest information about the proposals, detailed below, we offer the following advice.

**Advice**

1. The Proposal

The proposal is for development of approximately 171 hectares (ha) of open land west of Ifield for a residential-led mixed use settlement. The eastern site boundary abuts Ifield Village which is the historic core of Ifield.

2. Significance

Development on this site would impact upon both designated and undesignated heritage assets and their settings, both within the boundary of the proposed development area and in the area around the site.

Significance can be harmed or lost through alteration or destruction of a heritage asset, or through development within its setting.

In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Statement to contain a thorough assessment of the likely effects which the proposed development of this area might have upon those elements which contribute to the significance of these assets.

Our initial assessment of the Scoping Report shows that the designated heritage



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assets within the near vicinity of the proposed development have been identified.

We draw your attention, in particular, to the following highly designated heritage assets within, or in the immediate area surrounding the proposal site (there are other designated assets identified in the report including Grade II buildings and Conservation Areas):

Medieval moated site at Ifield Court (scheduled monument) National Heritage List  
no 1012464  
St Margaret's Church (Grade I listed) NHL no1187108

We give more detailed comment on these two heritage assets in section 4 below, and have also provided pre-application advice upon which our comments are based.

### 3. Setting assessment

Given the scale of the proposed development and the range of heritage assets in the area, it is likely that development in this location would be visible from these assets, and as a result may affect their significance.

Dependent on the topography of the proposed development area, heritage assets further afield could also be affected.

We recommend close collaboration of cultural heritage and landscape/visual impact assessment, in order to adequately address issues in relation to setting of designated heritage assets. Techniques such as photomontages, computer generated views analysis imagery, and verified views with wireframes are a useful part of understanding visual impacts. Analysis of key views from within the site boundaries, out of, and across the key site areas in relation to designated heritage sites will be important.

Setting may also form a part of the wider conceptual significance of a heritage asset and how it is experienced, and the report must therefore additionally reflect these more nuanced aspects of setting in order to fully take account of impact.

Further guidance on setting can be found at our website:  
(<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>). Version 4 of this document is currently under review.

### 4. Overall approach

An integrated approach to assessment is required for this project that demonstrates an understanding of how all the individual elements of the historic environment come together to form a 'special place', and which fully analyses how the development proposals may impact upon the specialness of the area, and the assets within it.



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We think it essential that an integrated *landscape approach* to assessment of heritage assets (both designated and undesignated) is undertaken and translated into the report.

The assessment should also take account of the potential impact which associated development activities (such as construction, servicing, maintenance, and associated traffic) might have upon perceptions, understanding, and appreciation of the heritage assets in the area.

The assessment should also consider the likelihood of alterations to drainage and ground water patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

The Conservation Area, the majority of the Listed Buildings (Grade II), and other built heritage will be a matter for the Local Authority. Impacts on these heritage assets will however, also need to be examined within the heritage baseline assessment and ES chapter.

## 5. Asset specific advice

### St Margaret's Church

The development has the potential to impact on the Grade I listed St Margaret's Church.

We appreciate that the setting of the church is largely focused on the village and the densely vegetated Ifield Meadows area. However, as discussed at the pre-application stage, there are some incidental wider landscape views to the tower from a PRoW to the south-west within the site, above the intervening tree belts.

The setting of the church and potential impacts of on its significance will need to be examined in detail within the heritage baseline assessment and the ES chapter.

### Ifield Court moated site

The development has the potential to impact on this scheduled monument.

Impacts could occur from changes within its setting, and from disturbance of potential currently unrecorded associated non-designated below ground archaeological remains.

Understanding the setting of the moated site, and how the scheme would change this (including potential visual changes and disruption to tranquillity) and how this may harm the asset's significance, will be a key requirement for the EIA.



Information on the potential volume of traffic along the proposed new road and the potential impact of this on the monument will need to be considered within the ES.

Research is needed on the former medieval setting and history of the moated site to determine (if possible) whether it was constructed within a wooded or more open arable landscape. If the latter, the addition of vegetation screening alongside the new road could cause additional harm.

We also have concerns regarding the prospect of vegetation screening being introduced to the non-designated parkland adjacent to the scheduled monument.

Mitigation of the impact of the scheme on the significance of the scheduled monument needs to be considered at an early stage. Particular attention needs to be given to the possibilities of enhancing the significance of the site through improving wider knowledge and interpretation of the monument, and its place in the wider medieval landscape.

### Undesignated heritage assets

We would expect the Environmental Statement to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place.

This information is available via the local authority Historic Environment Record ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)) and relevant local authority staff.

We strongly recommend that you involve your own conservation and archaeological staff at both Horsham and Sussex County Council in the development of this assessment. They are well placed to advise on: local historic environment issues and priorities; the nature and design of any required mitigation measures (as decided at a further stage in any project); and opportunities for securing wider benefits for the future conservation and management of heritage assets.

The ES should also include a consideration of potential non-designated heritage assets and views on whether these would meet the criteria for national or local designation. The assessment process should also allow for correction of discrepancies between the recorded and actual locations of designated heritage assets.

## 6. Policy

There will be a requirement through planning policy (NPPF and local policy) to avoid and minimise harm to heritage assets, and there will be a presumption in favour of conserving designated assets. By following planning policy and guidance we would



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also additionally expect the project to be creative in how it might offer opportunities for their enhancement, and how the project might deliver public (heritage) benefit.

Given the importance of the heritage assets within the area, we would expect to provide further advice in due course on this application.

### **Recommendation**

We urge you to address the above issues, and recommend that production of an Environmental Statement should continue in accordance with national and local policy guidance, and following your expert conservation advice. If you have any queries about any of the above, or would like to discuss anything further, please contact me for further advice.

Yours sincerely,

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Inspector of Ancient Monuments  
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