



Historic England

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Direct Dial: 020 7973 3739

Our ref: P01545782

12 October 2022

Dear Ms Harrison

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

**THE AGEAS BOWL, MARSHALL DRIVE, WEST END, SOUTHAMPTON
Application No. F/22/93194**

Thank you for your letter of 13 September 2022 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

Hickley Wood Hillfort and the Telegraph Woods beacon are two nationally important monuments that contribute to our understanding of two different periods of this country's history. The development proposals involve the construction of housing immediately adjacent to these designated heritage assets, which will potentially erode their setting context and, consequently, harm their significance. Not enough information has been provided in line with the requirements of the NPPF, to meaningfully assess the level of harm that would be caused. In addition to this, we are not assured that enough work has been undertaken to minimise or avoid potential harm to the scheduled sites and note that no heritage benefits have been proposed that can be considered as part of the balancing process.

Historic England Advice

A number of designated heritage assets are situated near to the proposed development sites. However, it is our view that only two of these have the potential to be adversely affected by the proposals and, consequently, these will form the focus of this consultation response.

The significance of the affected heritage assets



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The proposed development is located north/north-east of two Scheduled Monuments, namely Hickley Wood Hillfort (NHLE: 1017888) and Telegraph Woods beacon, 170m north of Fir Cottage (NHLE: 1017893).

Hickley Wood Hillfort

The earthworks in Hickley Wood comprise the remains of a slight univallate hillfort, dating to sometime between the Late Bronze Age and Early Iron Age (eighth - fifth centuries BC). They were formed on a gravel-capped spur which projects east from a gravel plateau. The hillfort, the western limit of which has not been precisely defined, was constructed approximately 250m from the end of the spur and is likely to have been roughly rectangular or oval in shape. It slopes steeply on the north and south sides but is easily approached along the spur from the east and west. Surrounding the interior, the defensive circuit survives in various states of preservation.

Slight univallate hillforts have generally been interpreted as stock enclosures, redistribution centres, places of refuge and permanent settlements. In view of the rarity of slight univallate hillforts and their importance in understanding the transition between Bronze Age and Iron Age communities, all examples which survive comparatively well and have potential for the recovery of further archaeological remains are believed to be of national importance.

Much of their significance is also derived from their setting. Defence was often an important consideration for hillforts and their locations were carefully selected. They were often sited prominently. As such, views of the surrounding landscape stand as an integral feature of these types of site.

Telegraph Woods beacon

The monument includes an Armada beacon dating from at least 1595, situated on flat land at the highest point of a gravel plateau known as Moorhill or Telegraph Hill, overlooking lower lying land to the west, north and east. It comprises a low mound, approximately 0.1m high and 6m in diameter, lying at the centre of a flat area surrounded by a shallow circular ditch and low inner bank, approximately 31m in diameter.

Beacons were fires deliberately lit to give a warning, by means of smoke by day and flame by night, of the approach of hostile forces. They were always sited in prominent positions, usually as part of a group, chain or line which together made up a comprehensive early warning system covering most of the country. To that end their setting and, in particular, views out of the landscape towards the remainder of the chain, are an extremely important element of their significance.

Impact of the proposals



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The scheme proposals comprise of new mixed-use development on land surrounding the existing stadium. They include; 185 new homes, a 71-bedroom care home, a 142-bedroom hotel, a well-being health centre and a new pavilion building. These are to be provide alongside improvements to existing stadium, new vehicular access, car parking, pedestrian circulation and a processional ramp, together with tree planting, landscaping, SuDs and biodiversity enhancements.

Archaeology

The nature of the groundworks required for the construction of new housing, alongside associated utility services and landscaping would impact any surviving archaeological remains. As the development is not located within any scheduled area, there will be no requirement for Scheduled Monument Consent (SMC).

Setting

The potential impact of the proposals on the two Scheduled Monuments, relate to a potential incursion on their setting, specifically by the new housing proposed in Character Area 5. This could, in turn, depreciate elements of their significance (as outlined above) and therefore be harmful.

With specific respect to Hickley Wood Hillfort, the woodland that surrounds the hillfort provides some screening, however this would not have been present so extensively when the site was in use during the Late Bronze/Early Iron Age. It is also not to be taken for granted that tree coverage here is a permanent element, and in wintertime its screening potential would be greatly reduced, and the new housing would be a noticeable encroachment. This would erode appreciation and understanding of the wider context of the fort to the north of the site, to an even greater extent than currently stands.

In relation to the Telegraph Wood Beacon - any development that creates a permanent barrier (present tree coverage notwithstanding) between this and views to and from the location of the next beacon in the chain, would impact the significance of the monument.

Policy considerations

National Policy on Scheduled Monuments

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



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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

The following elements of the NPPF are relevant to this application:

- 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 - including heritage benefits (Paragraph 202).

Local Policies

The site is located within the administrative area of the Borough of Eastleigh, which adopted the Eastleigh Borough Local Plan review 2001-2011 on 25th May 2006. Relevant Saved policy of the Local Plan Review, dating from May 2009, relating to the historic environment at the site includes:

- 166.LB Development which would destroy or damage, directly or indirectly, a scheduled ancient monument or other nationally important monument, or adversely affect their settings, will be refused.

The forthcoming Eastleigh Local Plan 2016-2036 was submitted for government approval in October 2018, with a public examination due in early 2019. At present, the following draft policy relating to archaeology and heritage is included within the draft document:



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- Policy DM12 Heritage assets:
 - o The Borough Council will conserve and enhance the Borough's heritage assets through:
 - III. Restricting development likely to harm them or their settings through management of development proposals; and
 - IV. Encouraging development that enhances them, ensures their long-term management and maintenance and where possible, enables public enjoyment and interpretation of the asset.
 - o Development of a heritage asset or within their setting will be permitted provided:
 - I. it does not harm or detract from the significance or special interest of the asset and sustains and enhances its special character and qualities. The more important the asset, the greater the weight that should be accorded to this criterion.
 - II. it achieves a high standard of design which respects and complements the character and qualities of the heritage asset(s);
 - III. where necessary, it secures the long-term future maintenance and management of the asset;
 - IV. where possible, it enables public enjoyment and interpretation of the asset.

Historic England's position

The proposals have the potential to cause harm to the significance of two Scheduled Monuments, by impacting their respective settings. The specific element of the proposals that could cause harm, relate to the new housing development in Character Area 5. The precise nature and degree of harm that this would cause cannot yet to be fully established with the evidence provided by the applicant.

Setting of Hickley Wood Hillfort

Although the application is supported by a 'Cultural Heritage Constraints Desk Based Assessment', certain information is lacking, and therefore its conclusions cannot be taken as sound.

Specifically, in relation to Hickley Wood Hillfort, the report lazily concludes that the setting of the asset no longer contributes to its significance, a conclusion that does not bear scrutiny. It suggests that the original setting has been substantially altered by modern development - but in actual fact modern development only exists to the north



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of the hillfort. The denser housing to the north-west is c.300m+ meters away from the Scheduled Monument. The proposed development of housing (with a similar density) would be 44m and hard up against the boundary of the woodland within which the monument is located. The more substantial Ageas Bowl is 145m away at the nearest point. As it currently stands some buffer exists between the fort and development that surrounds it to the north, but the new proposals would erode that buffer significantly. The matter of tree screening is noted above when discussing impacts to the setting.

Photographs have been provided of the view from the monument towards the location of the proposed housing in Character Area 5 (presently a car park). No visualisations have been provided that would show the impact on this view from the hillfort. In order to meaningfully assess the level of harm the housing development would cause here (Paragraph 195), fully rendered photomontages (not wireline) should be provided - including wintertime views.

Setting Telegraph Wood Beacon

As the DBA report notes, the setting of the beacon site is somewhat intrinsic to its significance, but this is more specifically related to views towards neighbouring beacons than the context and nature of its immediate surroundings.

The report makes no attempt to establish and understand how this beacon related to other beacons in the historic chain that it once formed part of. Consequently, it is not possible to understand whether the placement of this development would or would not sever the historic view which contributes greatly to its significance.

As no views have been submitted from the site of the beacon towards the development, it is not possible to meaningfully assess the level of harm (if any) that would be caused by the proposals. To this end we would request that further research is undertaken to understand the landscape within which the beacon was historically located - specifically in relation to neighbouring beacon sites, in order to understand the key views of this particular monument. Once this has been established it may be necessary for fully rendered photomontages (including wintertime views) to be provided so that an assessment of the impact of any key views is understood.

Archaeology

We accept that the potential for prehistoric remains associated with the Scheduled Monuments may be low (given current knowledge). However, any such features, if they were to occur, may, dependant on their nature, be considered nationally important in equivalence to the scheduled sites. In such an instance, these remains would be subject to the same policies as designated heritage assets (Paragraph 200 fn 68).





We would defer to the Hampshire County Council Archaeological Advisors on the matter of any undesignated archaeological potential for the site.

Minimising or avoiding harm

Until the potential impact is more fully understood, it is not clear to what extent efforts to minimise or avoid any potential harm have been made, and whether it goes far enough. If harm is proven to be caused by the proposals, then it will be necessary to take further steps within this regard (Paragraph 199 & 200).

One potential proposal would be to create more of a buffer between the proposed housing in Character Area 5 and Hickley Wood. This could be achieved by moving the housing back towards the north and creating a green space/recreational ground.

Heritage Benefits

No heritage benefits have been provided as part of the proposals. Given the proximity of at least two nationally important Scheduled Monuments, and the likely harmful impact the proposals would have on their significance, this is somewhat surprising (Paragraph 202).

We would be happy to explore potential heritage benefits with yourselves and the applicant, which could involve improved maintenance, public access and interpretation of the monument (Paragraph 189, 197 & 206), potentially linked to the development site (such as through the above suggested green space/recreational ground).

Recommendation

Historic England has concerns regarding the application on heritage grounds.

Further information and work is required, specifically:

- Additional photomontages of the proposed housing from the two Scheduled Monuments, as detailed above;
- Further research and understanding of the significance of views from the beacon;
- Potential amendments to the design of the development to create a buffer between it and the designated heritage assets;
- The introduction of heritage benefits to form part of the balancing process.

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.





Historic England

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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Inspector of Ancient Monuments

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