



Historic England

Ms Liz Harrison
Eastleigh Borough Council - Planning
Eastleigh House
Upper Market Street
Eastleigh
Hampshire
SO50 9YN

Direct Dial: 020 7973 3739

Our ref: P01545782

5 October 2023

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 15 September 2023 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Historic England Advice

The significance of the adjacent heritage assets, impact of the proposals and relevant policy considerations were outlined in a previous letter dated 12 October 2022 (attached for your convenience). I have also attached our last advice letter, dated 16 August 2023, in response to an interim submission of addition information.

Since then, the applicant has submitted an amended Cultural Heritage Constrains Desk Based Assessment and some photomontages showing the proposed development from the two Scheduled Monuments located within Telegraph Woods.

Telegraph woods beacon

My previous advice letter requested a wireline drawing demonstrating the building heights from the location of the scheduled beacon. This was intended to demonstrate whether the development would impact the wider relationship of the beacon with the historic locations of any further beacons in the chain (not accounting for present tree coverage).

The applicant has provided a photomontage which indicates the low-lying level of the proposed development in relation to the elevated position of the monument. As such we are content that the development will not cause harm to the significance of the



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scheduled beacon, through an impact on its setting.

Hickley Wood hillfort

Our position in relation to the previous information provided was that the proximity of the new development would likely cause some harm to the significance of the monument through the incursion of new urban structures within its immediate setting. It was not possible to ascertain the extent or level of harm as no photomontages had been submitted.

The photomontages now provided by the applicant demonstrate the imposing and visible nature of the development through the trees, obscuring the horizon that is currently perceptible. This divorces the hillfort from its surrounding landscape setting, which would have been a key determining factor for its defensive siting during the late Bronze Age/early Iron Age.

As articulated in previous advice letters, the present tree coverage/screening cannot be taken for granted as tree's can be subject to removal due to forces of nature, disease or human action. The proposed screening does little to arrest the visual impact and presence of the buildings and the 20m buffer is, as previously noted, too modest to be of any real benefit.

To this end we would determine the level of harm caused to the monument by the development proposals to be a mid to high level of less than substantial harm.

Minimising or avoiding harm and heritage benefits

As noted in the NPPF, great weight should be given to the conservation of designated heritage assets. This is particularly true of nationally important assets, of which the Hickley Wood hillfort is one, as demonstrated by its designation as a Scheduled Monument. As these are irreplaceable assets, any harm or loss (including to their setting) should require clear and convincing justification (Paragraphs 199 and 200).

We suggest that further actions should be explored to reduce the harm. This could potentially include moving the development further away from the wood and in doing so create a large green recreational space. The heights of the buildings could also be reconsidered.

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).



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The amended heritage statement references the “possibility” of securing the ongoing conservation of the hillfort and beacon as part of the development proposal. This should be explored in more detail so a concrete and positive proposal can be established that could be utilised as a heritage benefit as part of the balancing process. This would need to be set out clearly as part of the application so as to secure these benefits. The details should be provided as a separate monument management and benefits statement, the contents of which would then be subsequently secured by condition in any permission your authority would be minded to grant.

Such benefits could include, a programme of vegetation management works to the monuments to reveal and enhance them and make them more legible to members of the public. This could include the establishment of formal paths (off the monument) to discourage informal desire lines crossing the hillfort and causing damage. Interpretation panels containing information about the site(s) would also be beneficial. These works would need established in consultation with Historic England and respect ecological and environmental policies. This latter consideration should be resolved prior to determination to ensure the benefits are achievable.

It should be noted that any works within the Scheduled Monument would require Scheduled Monument Consent (SMC) which is a process administered by Historic England. Early consultation with us on any proposals is strongly advised.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

Specifically, we would suggest that further amendments (as outlined above) are made to reduce the harm caused to Hickley Wood hillfort. We would also request that a considered and detailed monument management/heritage benefits plan is submitted to the application prior to determination. This would allow for any heritage benefits to be agreed and then subsequently secured by condition attached to any permission granted.

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 197, 199, 200, 202 & 206 of the NPPF.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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Historic England

Yours sincerely

Iain Bright

Inspector of Ancient Monuments

E-mail: ian.bright@HistoricEngland.org.uk



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