

WEST SUSSEX COUNTY COUNCIL – PLANNING SERVICES

Environment & Heritage Team – Response to consultation by County Planning

ARCHAEOLOGY comments

To: - planning.applications@westsussex.gov.uk

FAO: - Jane Moseley, County Planning

DATE: 12th May 2020

Consultation date: 15th April 2020

REF.: WSCC/019/20

LOCATION: Knepp Castle, West Grinstead, Horsham, RH13 8LJ

PROPOSAL: Proposed construction of landscape enhancement features using imported inert material, together with the provision of public access and amenity, comprising revised landform and details to WSCC/029/19/SP

RECOMMENDATIONS:

No objection, subject to a planning condition to secure archaeological mitigation measures through a Written Scheme of Investigation for archaeological investigation, recording, and reporting during new development-related groundworks.

Policies: National Planning Policy Framework (2019) para. 199; West Sussex Waste Local Plan (April 2014), Policy W15: Historic Environment, and Strategic Objective 10: *To protect, and where possible, enhance the natural and historic environment and resources of the County*; Horsham District Planning Framework (excluding South Downs National Park), November 2015, Policy 34(8) (Cultural and Heritage Assets – Archaeology).

Planning Condition (Archaeology)

No development shall be carried out (including any demolition and site clearance) until:-

Part 1- a written scheme of investigation for a programme of archaeological work has been submitted to and approved by the County Planning Authority. The scheme should include provision for field survey recording the analysis reporting publishing and archiving of the results.

Part 2 - Once approved the scheme of archaeological work shall be implemented in full in accordance with a timetable to be agreed within the scheme.

REASON: To enable the recording of heritage assets of archaeological interest.

SUMMARY:

- The proposed arrangements for mitigation of the scheme's archaeological impact (below-ground archaeological remains of a Late Iron Age/ Roman enclosure and other features) are acceptable.
- Provision for a programme of archaeological investigation and recording should be made through the use of a suitable planning condition.
- The new proposals would have impacts upon the settings of the Grade II Registered Knepp Park and Grade II* Knepp Castle mansion, designated heritage assets, at the level of less than substantial harm or loss (very low to low impact) to the significance of those assets.
- These impacts are considered low enough as to be acceptable; no objection on historic landscape grounds is raised to the proposals.
- Potential new enhancements to the setting of the Park, beyond the scope of the currently approved landscaping scheme, are represented by the following: -
 - a) the proposed "amphitheatre" as an "eyecatcher" fitting into the early 19th-century designed landscape concept of the Park;
 - b) the view over the trees from the proposed realigned public footpath and new viewpoint on the high rim of the "amphitheatre", looking down the length of the Mill Pond towards the mansion;
 - c) the intended re-profiling of the narrow bund-like Floodgates Farm landscape feature, adjoining the Registered Park, to resemble the wider, more naturalistic landform of the currently approved landscaping feature along the A24, south of Hill House Farm, and within the Registered Park.
- These enhancements are acceptable and aesthetically of merit ((a)) and desirable and welcomed ((b) and (c)) in historic landscape terms, albeit there are not sufficient grounds to consider these proposed changes to be essential to the long-term sustainability of the Registered Park.

COMMENTS:

The following comments address archaeological and built heritage considerations. The West Sussex Historic Environment Record (WSHER) database has been consulted (internal search, 27/4/2020).

Scheme impact (Archaeology - below-ground archaeology)

In brief, the applicant's proposals for archaeological mitigation measures in respect of below-ground ancient features follow procedures proposed in connection with previous landscaping work on the site, and are acceptable.

The submitted *Heritage Impact Assessment – Archaeology* outlines the known archaeology of the site, including the findings of pre-application archaeological field evaluation (exploratory trial trenches) in September 2019, within the footprint of the proposed Buck Field "amphitheatre".

Parts of a rectangular Late Iron Age/ Roman ditched enclosure, possibly a (live)stock enclosure, have been identified within the Buck Field landscape feature footprint. It appears to be uncomplicated and with few traces of permanent ancient occupation; but because few such enclosures of this date are known in the Sussex Weald, still, it should be considered to be significant in a local/ Sussex context.

As such, the impact upon it of intended new topsoil stripping and landscaping may be mitigated by means of more comprehensive archaeological investigation and recording. The applicant has proposed reasonably the excavation of further exploratory trenches here, preparatory to wider investigation and recording.

The intended wider landscaping footprint north of Hill house Farm has been the subject of archaeological investigation only on its eastern margin, where no ancient archaeological features were identified. The applicant's proposal to carry out new exploratory archaeological trial trench investigation within the wider footprint, with follow-up additional investigation if/ where warranted, is acceptable.

Scheme impact - Settings of Grade II Knepp Park Registered Park/ Garden and Grade II Knepp Castle (mansion) Listed Building*

None of the proposed additional/ amended landscape enhancement features is located within the Knepp Park Registered Park/ Garden. They do closely adjoin the Park; the visual impact of the new proposals on the Registered Park is considered below.

Change in Registered Parks and Gardens

In the submitted Heritage Impact Assessment (HIA Architecture), Appendix 2 of the Environmental Statement (ES), it is stated that historic parks are not seen by Historic England and The Gardens Trust as "frozen in appearance to one identified period of time", but that they evolve all the time.

Written policy guidance on this point from these advisory bodies has not been found, but there is relevant guidance for Wales: "Registered historic parks and gardens continue to evolve. They cannot be frozen in time and change is often necessary to secure their long-term sustainability" (Cadw (Historic Environment Service for Wales), *Managing Change to Registered Historic Parks and Gardens in Wales*, 2017, p. 8). There appears no reason why this guideline for Registered Parks and Gardens in Wales should not be equally relevant to Registered Parks and Gardens in England.

The new landform as heritage/ landscape enhancement

In respect of the guidance on change within Registered Parks and Gardens, it should be noted that the Buck Field and Floodgates Farm proposed new landforms are not located within the Registered Park. However, they are adjacent to and visible from it, and so would have effects upon its setting, in terms of visual impact upon and change to the viewer's experience of the Park.

Floodgates Farm landscape feature

The Floodgates Farm feature, just outside one corner of the Registered Park, would not have an adverse effect upon the Park's appearance. It is presented reasonably as an enhancement to the setting of the Park, in that its new and more naturalistic profile would resemble that of the approved adjoining perimeter landscape feature to the north (south of Hill House Farm and inside the Registered Park), instead of the narrower, steeper-profiled bund-like feature currently approved.

Hill House Farm (north of) landscape feature

The footprint of this expanded landscape feature would also be located outside the Registered Park. Existing ground levels would be raised by up to 5.0+ metres, linking the Buck Field "amphitheatre" landform and currently approved landform north of Hill House Farm. The field as re-profiled would be largely screened from the Park by the belt of trees along the eastern edge of Knepp Mill Pond (Verified Photowire Viewpoint 1A, dashed blue line). New landscaping should involve minimal impact upon the setting of the Registered Park.

Hill House Farm (small landscape feature extension)

No objection.

Buck Field landscape enhancement feature

The Buck Field landscape feature would be located outside the Registered Park.

The proposed “amphitheatre” open-bowl landform in Buck Field would be the most prominently visible new landform within the Park. It is put forward as:

- an “eye-catcher” in the language of early 19th-century landscape design, a reciprocal to the originally intended south-easterly vista from the present mansion to Knepp Castle ruins (another “eye-catcher”), south-east of the Mill Pond;
- a new viewpoint – from the high rim of this feature – for the public, from the realigned footpath, down the Pond towards the mansion, 1km distant;
- an enhancement of the originally intended effect of enclosure of the Park from the surrounding landscape (by local topography and tree belts);
- a stop to terminate the north-easterly vista from the house across the lake;
- an enhanced buffer to noise from the A24/ A272 road junction;
- a distinctive feature of new parkland design in its own right.

All of these attributions are reasonably claimed, although it should be noted that the currently approved Buck Field landscape feature and tree planting would already provide a noise buffer for residents within the Park.

The view from the top of an existing temporary earthwork viewing platform viewpoint at the height of the proposed amphitheatre rim, visited on 6/6/2019, suggests that a new vista from amphitheatre to the Knepp Castle mansion house should be achievable, with the help of the proposed clearance of several trees along the edge of the lake (Appendix 2, Heritage Impact Assessment (Architecture), p. 22).

Proposed Photowire Viewpoint 1A appears to show this location, marked by an arrow, although it is labelled, confusingly, “Profile of proposed landscape north of Hill House Farm”, which would be located further south and much further from the Mill Pond. It is noted that the tree clearance referred to would be located outside the red line boundary of the present planning application.

The open-bowl, valley-side form of the proposed “amphitheatre”, with its “sighting pond” in the floor of the bowl would not be out of place at the edge of the Park’s early 19th-century landscape (Design and Access Statement, p. 20). There is a long tradition of creating new amphitheatres, as earthworks or in masonry, and adapting natural ones to enhance designed parkscapes.

Considered as a stand-alone landscape feature, outside the present boundary of the Registered Park, in its finished and grassed-over form the “amphitheatre” would not have an adverse impact upon the view across the lake from the mansion, and would provide a useful landmark for the visitor’s orientation, within the Park.

Sitting on, but barely above the treeline, as viewed from the mansion, it would not be so prominent as to detract from the sense of enclosure provided by the long sweep of tree along the valley side.

In reverse, the view from the new public footpath on the rim of the amphitheatre, across the lake to the mansion would enhance the visitor's understanding and appreciation of the Park. At 31 metres AOD, this viewpoint would be 3 metres higher than the 28-metre maximum height of the approved landform.

An information board at this viewpoint, one of those proposed for the realigned footpath, explaining the original historical landscape concept of the Park, would provide a further enhancement to the visitor's experience of the Park.

It would be reasonable to see (a) the "amphitheatre", (b) the revised landform of the Floodgates Farm landscape feature and (c) the new vista from the realigned public footpath on the high rim of the "amphitheatre" as potential aesthetic enhancements to the setting of the Registered Park, and improvements to the experience of the Park by the public. These enhancements are acceptable and aesthetically of merit ((a)) and desirable and welcomed ((b) and (c)) in historic landscape terms.

Other heritage related aspects of the proposed landscaping would also be largely achieved by the currently approved scheme, i.e. noise buffering near the A24/ A272 junction and along the A24 road, and views westwards across the Mill Pond towards Knepp Castle mansion from the realigned footpath. The currently approved Buck Field landscape feature and associated tree planting would, in their finished, vegetated form, still maintain the sense of enclosure of the Registered Park.

On analogy with the most recent Government guidance on change within Registered Parks, compiled for Wales, there are not sufficient grounds to consider that the proposed revisions to the currently approved landscaping scheme, and potential enhancements to the Registered Park, would constitute change *necessary to secure [the] long-term sustainability* of the Park, as that guidance expresses it (my italics; see above, Change).

Overall assessment of scheme impact and conclusion

It is clear that the landscape improvements as a package would cause less than substantial harm to or loss of significance of the setting of the Grade II Registered Park or Grade II* Listed Knepp Park mansion (NPPF, para. 195). Within that category of "less than substantial harm", the impact of the proposals would be very low.

On this basis, no objection on archaeological, built heritage or historic landscape grounds is raised to the new proposals.

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