

# Bexhill Heritage

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Caring for Bexhill's past,  
present and future.

Dear Miss Edwards

2<sup>nd</sup> February 2019

## RR/2018/3127 Outline; Residential Development for up to 99 dwellings off Clavering Walk Bexhill

Our remit is confined to the heritage aspects of applications, which are in this case of considerable significance. Our focus is largely on Cooden Moat, which Historic England have covered in some detail albeit lying outside the application site, and we also comment on areas within the application site primarily covered by the County Archaeologists objections. Though the views these two bodies separately and together are formidable, nevertheless our objection is fundamental to any development to anywhere on the application site, but most particularly to the potential effects on the Scheduled Ancient Monument, Cooden Moat.(AM)

Should development be permitted here we envisage several adverse effects on Cooden Moat arising from the large increase in population immediately adjacent, as the site is a natural focus of interest. To begin with, adults and children will enter the site of the Moat, treading down the vegetation on the island and around. With ground cover disappearing, possibly assisted by cutting back, the island and the land immediately adjacent will be subject to-

1. Damaging work by metal detectorists who will dig to investigate any response
2. Damage and erosion by nearby new residents who may dig for anything they think may be there e.g. coins, potsherds, bricks, tiles, 'hoards'.
3. Damage and erosion by incursions by people from further away who may learn of a 'find', even a small one, through social media and visit out of curiosity.
4. Damage and erosion by cycle cross adventurers to whom the Moat and island would be a challenge and a draw especially if published on social media sites.
5. Damage and erosion by motocross bikes drawn by the challenge of the concrete blocks, Moat and island.
6. Erosion simply by walkers and dog walkers curious and interested, walking on the island

The site is not presently subject to these damaging activities, there are several reasons for this –

- a) The very low density residential area adjacent to the site together with the geography of this part of the town results in there being little pedestrian traffic along the adjacent footpaths.
- b) The presence of the Ancient Monument is not signed in any way.
- c) The site has no frontage to a public road and its northerly approaches seem somewhat private.
- d) The public have no reason to visit the fields which comprise the application site

- e) The site is well screened and protected from views from adjacent footpaths by dense vegetation.
- f) The site is difficult to access being overgrown with brambles, nettles and saplings.
- g) The footpaths are used by local people who know the Ancient Monument should not be damaged.

Many of the above factors which presently guard the site from unwelcome incursions and consequent damage will be negated if the development occurs because –

- Weight of numbers of new residents, perhaps 250 people of all ages. It is likely, indeed perhaps certain, that a high proportion of these residents will regard the Ancient Monument as part of their recreation area, being on their doorstep and not being used for any particular purpose.
- The new residents will have ready access to the Ancient Monument by the adjacent public footpath to which a link is intended.
- The new residents will show visitors/ friends around the area making it known to a wider public audience.
- The children living on the new development will quickly deal with the protective brambles and saplings referred to earlier. It may be that the builders of the development precede them.
- The outline plan submitted with the application indicates the intention to make the footpath access more noticeable/usable, this will encourage more members of the general public creating more incursion.

Historic England refers briefly to “population pressure”, it is perhaps the above factors and others which they had in mind. Historic England asks that a desk based assessment be carried out to quantify the increase population pressure and its knock on effects. In our view this is an impossible task. We have nevertheless considered the increase as outlined above and conclude that it will be considerable and unacceptable.

We have also given thought to whether anything can be done to mitigate these damaging problems from arising and observe as follows-

- The AM and its immediate surrounds are outside the control of the applicants – the application is clear on this. Thus nothing is possible except by the agreement of the owners of the land where the A M stands. Such agreement is not likely to enforceable by RDC.
- Even if an agreement were possible, no practical solution to prevent incursion can be envisaged. For example: any fencing or railing erected around it would be quickly breached and in any event and would be visually damaging to the setting of the AM.
- Even if it were to be placed along the public footpath it would be more invitive than preventative and thus unsuccessful.
- The same could be said of signage even if it were refer to the penalties for interfering with the A M.

- CCTV would have limited deterrent effect, high maintenance commitment and would be liable to damage or removal here.
- Sussex Police employ a Heritage protection officer – he is stretched.

The applicants point out that the site of the AM is well screened from public view and they regard this as a virtue. That same feature is described by Historic England as a problem and give reasons in their letter of response. Bexhill Heritage believes that even though the AM is in a different ownership to the application site, the degradation of the site and the loss of ground cover resulting will cause the seclusion of the site to disappear leaving only significant ancient trees (principally oak) in its environs. Thus neither the seclusion claimed by the applicants nor the open setting wished for by Historic England will be achieved, even allowing that the applicants may choose to follow the Heritage England advice and delete the more northerly section of development.

From the foregoing it will be seen that Bexhill Heritage perceive a risk to the AM so severe that the proposed development conflicts substantially with the N.P.P.F. We refer in particular to paras. 193,194, and 195 of the current Framework which state that proposals which offer

**“substantial harm to ....assets of highest significance, notably scheduled monuments....should be wholly exceptional”**

And

**“where proposed development will lead to substantial harm to a designated heritage asset, planning authorities should refuse consent unless....”**

There then follows a short list of exceptions none of which are relevant in this case.

The County Archaeologist also regards the application as a very serious matter in relation to archaeology which may be present on the application site itself, and asks for refusal unless a full archaeological programme of works is carried out before a decision is made. We believe the case against the development is so strong that there is no point in an expensive archaeological exercise being carried out and the site should be left intact for future generations to explore, using the latest techniques.

**Conclusion** The application be refused on the grounds of conflict with the N.P.P.F. in that an unacceptable degree of damage will be caused to Cooden Moat an asset of National Importance.