

## WEST SUSSEX COUNTY COUNCIL – PLANNING SERVICES

### Environment & Heritage Team – Response to consultation by County Planning

#### ARCHAEOLOGY comments

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**DATE:** 21<sup>st</sup> August 2020

**Consultation date:** 20<sup>th</sup> July 2020

**REF.:** WSCC/036/20

**LOCATION:** Ford Circular Technology Park, Ford Road, Arundel BN18 0XL

**PROPOSAL:** Demolition of existing buildings and structures and construction and operation of an energy recovery facility and a waste sorting and transfer facility for treatment of municipal, commercial and industrial wastes, including ancillary buildings, structures, parking, hardstanding and landscape works.

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#### RECOMMENDATIONS:

Objection is raised to the proposals on the grounds of their major adverse impact upon the settings of the Grade II Listed Buildings to the south of Ford Lane and St Andrew's Church, causing substantial harm to and loss of significance of those heritage assets.

Policies: National Planning Policy Framework, paragraph 195; Adopted Arun Local Plan 2018, Policy HER DM1 (Listed Buildings) (e).

#### COMMENTS:

The following comments address archaeological (including historic landscape) and built heritage considerations. The West Sussex Historic Environment Record (WSHER) database has been consulted (internal search, 3<sup>rd</sup> August 2020).

Archaeological and built heritage considerations relevant to this application are presented in Chapter 10 (Cultural Heritage) of the Environmental Statement (ES).

#### Built Heritage

##### *Former Ford military airfield structures*

The existing former aircraft hangars 1 and 2 (type B1 aircraft sheds) on the site were built in 1948-51 for the post-war military airfield; in 1946 their site was occupied by part of the RAF aircraft dispersal area and a workshop. It is stated in the ES (10.69) that they are "of a standard and common building type, have been extensively altered and are in

the greatly changed setting of the partly redeveloped airfield". For these reasons they have been assessed as of "low-negligible importance".

This is a reasonable assessment of the hangars' present significance in a national context. An additional consideration is that they lack a direct connection with the internationally important and locally memorable events of World War II. No objection on archaeological grounds is raised to their demolition, subject to an adequate historic building archaeological record (photographic, with drawn sections, concise written description and historical context).

*Scheme effects on designated heritage assets: visual impacts on settings*

Numerous heritage assets are included within the Zone of Theoretical Visibility (ZTV) of the proposals. The observations below focus on the effects of the proposals on designated heritage assets within 1 km of the site and on Arundel, because of its elevated location on the edge of the South Downs, and the concentration at the highest point of the town of Arundel Castle, Arundel Park, Arundel Cathedral and St Nicholas' Church, respectively a Scheduled Monument and Grade I Listed Building, a Grade II\* Registered Park/ Garden, and Grade I Listed Buildings.

1. General: the coastal plain

On the crest of Halnaker Hill (Viewpoint and Visualisation 18) is a Scheduled Monument - a Neolithic causewayed enclosure - and the locally well-known Grade II Listed Halnaker Windmill'

The Ford site is too far from these (9.5 km) to have anything but a low visual impact on the settings of these two heritage assets, but the Visualisation provides a good impression of the prominence they would have as unusually tall structures upon the coastal plain. Comparably tall structures within this visual envelope are few: Chichester Cathedral, the Littlehampton Gas Holder, and high-rise buildings in Littlehampton and Bognor Regis. Because of their height and bulk, the new buildings will be in view of heritage assets over a wide area of the coastal plain.

2. Atherington House, Ford Place, Southdown House, The Lodge, Ford Lane

Close to the site (245 metres), Viewpoint VP26 is taken from the roadside on Ford Lane, adjacent to the Grade II Listed Atherington House, Ford Place and Southdown House, a late 17<sup>th</sup>-/ 18<sup>th</sup>-century building, subdivided. They belong to a distinctive building style of the period, the "Artisan Mannerist", and before subdivision were used as the farmhouse of one of the larger farms in Ford Parish, Ford Place Farm.

The buildings' local significance lies in their building style, their historical setting essentially rural/ agricultural, as a farmhouse on a narrow country lane, amidst arable fields. In the 19<sup>th</sup> century a rural canal operated in the background, and in the mid- 20<sup>th</sup>-century a military airfield.

A visualisation has not been provided. The eastern end of Hangar 2 of the former military airfield is visible in Viewpoint VP26, on the far side of an arable field (lying outside The Landings strategic development area), and at the edge of views from the upper storey of the Listed Buildings (from WSCC visit to VP26, 13/8/20). Hangar 1 and the remainder of Hangar 2 are almost wholly screened behind the line of tall trees on the north side of the footpath running along and outside the northern site boundary.

The height of the existing former hangars would be considerably overtopped by the new buildings. Owing to their height and monolithic massing, the new buildings would constitute a considerable new visual intrusion into the existing setting of the Listed

Buildings, which remains largely rural/ agricultural, and a significant new adverse visual impact upon that setting.

Because of their height, mass and proximity to the Listed Buildings, filling the skyline in southerly views from the Listed Buildings, mitigation of this impact does not appear to be feasible. A permanent adverse effect, through loss of significance of the Listed Buildings' largely rural/ agricultural setting, would result.

The submitted Sun Path Study for the Winter Solstice indicates that long winter shadows cast by the new buildings during the late afternoon would place the Grade II Listed Buildings in shadow, another permanent visual change to the Listed Buildings' settings, although temporary each year. However the existing shadowing effect at this throughout the year upon the Listed Buildings of the tall trees in the hedgerow running southwards from the Listed Buildings towards Hangar 2 should be taken into account as well, so as to isolate for the purposes of visual impact assessment any shadowing effect exclusive to the new buildings.

### 3. St Andrew's church, Ford

St Andrew's church, Ford, is a Grade I Listed Building, and therefore a designated heritage asset "of the highest significance" (National Planning Policy Framework (NPPF), February 2019, para. 194 (b)).

In the medieval period, contemporary with the church, it stood at the east end of a very small village, bounded on the south by a lane from Ford Road and on the west by Ford Road itself. The village became deserted in the 1500s, possibly due to regular flooding. Part of the village site was later cut through during construction of the Portsmouth-Arundel Canal, now filled in. The present open surroundings of the church, constituting its setting, reflect the desertion of the settlement which led to the isolation of the church; and so are integral to understanding of the history both of the church and Ford village.

It has been stated fairly in the ES that the existing setting of the church is extensive and open, and that Ford Road, HM Prison, Ford, Rodney Crescent, the houses at the end of Ford Lane and the existing hangars and industrial development on Ford Airfield to the rear constitute a visual and aural (i.e. noise-related) separation or edge to the setting of the church (ES, 10.105).

Viewpoint and Visualisation VP14 are located on the bank of the River Arun, 260 metres behind the western elevation of the church, nearest the proposal site. An additional viewpoint and visualisation from the west end of the church were requested by the County Council in pre-application consultation about viewpoints (April 2020), but have not been taken owing to the then current Covid-19 lockdown movement restrictions (ES, 10.24).

In photographs taken by WSCC in January 2020 from the west end of the churchyard at Ford, the existing hangars in the application area are visible from Ford church, 700 metres distant, but are not prominent, appearing between the houses of Rodney Place and no higher than the tops of the roof- and adjacent tree-lines.

Referring to the more distant Viewpoint and Visualisation VP14, the new buildings would be visible from that viewpoint at twice the height of the existing roof- and tree-lines, the stack higher still. From the western end of the church, the new buildings will appear higher and more prominent, with correspondingly greater effects upon the setting of the church.

The height and monolithic mass of the new buildings would constitute a major new intrusion into the visual envelope of the church. In view of the national “highest significance” of the church, and the historical significance of its open and still very largely rural setting, the new buildings would constitute a permanent adverse impact upon that setting and loss of significance to that heritage asset.

#### 4. St Mary’s church, Climping and closely adjacent medieval village earthworks

St. Mary’s church, Climping (Grade I Listed Building) is located 0.95 km south-east of the site. Earthworks of the shrunken medieval village of Climping, parts of a Scheduled Monument, are located nearby, to the south and east.

Viewpoint VP25 from outside the church shows a few small trees in the foreground of the line of sight from church to site, but without a Visualisation (requested April 2020 during pre-application advice), it is not possible to assess whether the upper parts of the new buildings and stack would be visible from the church, and how prominent they would be within the settings of the church and Scheduled Monument.

In view of the proximity of the church and monument to the site, and their highest significance as heritage assets, provision of a Visualisation from Viewpoint VP25, , requested at the Scoping stage of this application, is essential for reliable assessment of the effects of the proposals upon the assets’ settings. Without that Visualisation, this application cannot be supported.

#### 5. Arundel

Viewpoint and Visualisation 4, taken from the A27 Arundel Bypass 3.95 km from the site, upon the coastal plain, show the new buildings at a point east of the flood plain of the River Arun. The buildings show as an intrusion into the view southwards from Arundel towards the coast, an important historical connection for Arundel as a historic town, because of its former status as a medieval port. At this low level, the buildings are noticeable, despite their distance from the town, but do not impinge upon that view in such a way as to cause major harm to the significance of the town’s setting.

Viewpoint and Visualisation VP 31, from Arundel Castle, are not illustrated. Viewpoint and Visualisation 29, taken from the top of Arundel Roman Catholic Cemetery, near the top of the town, are not useful for assessment of the views from the highest point of Arundel, where Arundel Castle, St Nicholas’ church, and Arundel Cathedral are situated on the ridge line, because of a tree in the immediate foreground.

Because of the urban topography of Arundel (downhill streets orientated north-north-west – south-south-east), it is not clear that southward views from the Cathedral and St Nicholas’ church at ground level would include the site, nor, because of surrounding planting, from within the grounds of Arundel Castle. From within the Castle at higher level, the site is likely to be more visible. Because of the significance of the view from Arundel Castle, as a heritage asset of the highest significance, more information is needed, in the way of views from the Castle, to enable assessment of the impact of the proposals upon the Castle’s setting.

#### 6. Yapton Conservation Area

In Viewpoint and Visualisation VP24, taken from a Public Right of Way to the north of Yapton Conservation Area, the new buildings and stack are prominently seen, almost four times the height of the intervening hedge and tree lines.

St Mary's church, Yapton (Grade I Listed Building), Church Farm House and Church Farm Mews, in that part of the Conservation Area nearest the application site, are well screened to the east by walls (the church) and tree lines.

Church Cottages and Crispin's Cottage, within the Conservation Area on the west side of Church Lane have views eastwards, with Church Farm and a tree line still further east. The existing hangars are not visible in the current view (site visit) but the upper part of the new buildings and stack may be at 1.25 km distance. Viewpoint 35, located immediately west of the churchyard, does not allow assessment of the effects of the proposals upon this part of the Conservation Area.

#### 7. Tortington Priory

Tortington Priory, comprising the remains of a 12<sup>th</sup>-century Augustinian priory, is a Scheduled Monument, situated 2.5 km north of the site. The Priory is well screened by mature trees on its southern and south-western boundaries.

No Viewpoint or Visualisation is available from the site, but referring to the perceived height of the new buildings and stack in Viewpoint and Visualisation 28, 800 metres to the south-west and so much nearer the site, the new buildings and stack would be unlikely to be visible through the screen of trees around the Priory.

#### 8. New Place, Ford Lane

Trees, walls and low buildings intervene in the view between the Grade II Listed New Place, on the north side of Ford Lane, and the site. At 540 metres' distance, it is possible that the uppermost parts and stack of the new buildings may be visible from upper storey windows.

### Archaeology

#### *Below-ground archaeological features and deposits*

The known below-ground archaeology and historical development of the site are fairly set out in Chapter 10 of the ES.

Known below-ground archaeological remains include a 300-metre long section of the early 19<sup>th</sup>-century Portsmouth to Arundel canal, infilled and buried below the former Ford Airfield, and remaining traces of part of the removed and built-over aircraft dispersal area of the World War II period airfield, comprising concrete slipways, a workshop and other small buildings.

There have been several previous archaeological intrusive and non-intrusive archaeological investigations on the former airfield that attest to the extent of earlier archaeology on the Airfield, from the Bronze Age to Roman periods. Areas of archaeological features of Iron Age and Roman settlement, recorded to the south in 1999 in advance of construction of the Ford Wastewater Treatment Works, extended northwards outside the Works, possibly as far as the current application area.

#### *West Sussex Waste Local Plan – site-specific archaeological policies*

The West Sussex Waste Local Plan (WLP), recently reviewed, includes the site as a Built Waste Management Facility allocation (WLP, 7.3.8). The Development Principles include provision (7.3.9) to the effect that if substantial new ground excavations are proposed, low-level archaeological mitigation (will be) required.

The term “low-level archaeological mitigation” is not defined, but is interpreted here to involve archaeological features and deposits, below- and above-ground. It is considered not to require preservation of such features and deposits intact (reserving for discussion with the applicant, if planning permission is granted, the unexpected discovery of nationally significant archaeological remains).

This mitigation is considered to include the preservation “by record” of archaeological features and deposits, including industrial archaeological features such as the buried canal, and former military historic buildings such as Hangars 1 and 2.

Preservation “by record” would involve on-site investigation and recording and subsequent off-site analysis and reporting, and public access to historical and archaeological information about the findings of the investigation and recording.

#### *The Portsmouth to Arundel Canal*

During its operation in the early 19<sup>th</sup> century, the Portsmouth to Arundel canal was a significant feature of the landscape and transport infrastructure of West Sussex. Parts of the Canal and its infrastructure (bridges) survive almost intact, albeit now normally dry; elsewhere it has been infilled and built over.

The buried section of the canal within the site is not specifically referred to in the WLP. Archaeological investigation and recording of buried remains of the canal, where it would be adversely affected by development, should form part of the mitigation alluded to in the WLP, together with these landscaping proposals relevant to the line of the canal.

It should be noted that as regards the canal, through several iterations of their Local Plan, Arun District Council have favoured a development principle of preserving the line of the canal. Well-preserved visible sections of the canal, not infilled and grassed-over, are allocated as green space (Arun District Local Plan (ADLP) Policies Map), and ADLP Policy HER DM5 requires that development will be permitted where it would not adversely affect the remaining line and configuration of the Portsmouth and Arundel Canal and features along it.

At Ford Airfield, where the canal is buried and not visible, ADLP Strategic Development Site SD8 (Ford) development principles require development to “Reflect the historic alignment of the canal” (Policy H SP2c (Housing Delivery) SD8 (Ford) (h)). On the illustrative masterplan of “The Landings”, Ford development proposal for Site SD8 (Arun District Council planning application F/4/20), a green space corridor is proposed within this very large site, broadly along the line of and commemorating the buried canal, on the western edge of the former Ford Airfield.

In the current waste related planning application, in the context of the limited space available for redevelopment, it has not been proposed to leave the line of the canal undeveloped. Most of the line of the canal within then site would be built over or cut through by underground drainage structures.

In terms of canal related mitigation, two breaks in the planting of the western and eastern boundaries of the site have been proposed, overlying the line of the canal and marking its course at these two points, with information to be provided on site about the history of the canal.

#### *Archaeological survival and scheme impact*

It is noted reasonably in the ES (10.87) that “the site area has suffered from earthwork clearance and construction of airfield and extant buildings on site” and that damage to archaeological horizons is unquantifiable. Much of the buried canal structure is likely to

survive below the existing concrete rafts and buildings, and (if present) Iron Age and Roman archaeological features may survive, possibly truncated (uppermost parts reduced/removed), in between areas of deeper 19<sup>th</sup>-century and modern disturbance for construction of the canal and airfield-related former slipways, tanks, bunkers, and building foundations.

Within the footprint of the proposed bunker for the energy recovery facility (ERF), deep excavations for new construction are likely to cut through and remove the northern edge of the buried and infilled canal structure entirely, and any shallower, more ancient archaeological features outside the canal. The underground drainage structures are not expected to cut as deeply into the infilled canal, but would cut through its full width.

Beyond the bunker and underground drainage structures, assessment of the below-ground archaeological impact of other new build is difficult, in the absence of details of the construction methods to be used. The submitted documents state that foundations of existing buildings, once demolished, are not to be grubbed out below ground level; that existing concrete standings will be used as foundations in some cases; and that heavy plant expected to be present during construction may or will include piling rigs. These statements imply a preference for retaining where possible the existing concrete hard standing, and an expected need for piling. For the purposes of these comments, both piled foundation and trench foundation construction methods for the new buildings will be considered.

Trench foundations would cut through the canal infill, probably to its full depth. The infill will be mid-20<sup>th</sup> century, and expected to be of negligible archaeological value, but the structure of the sides and floor of the canal is expected to have been lined with puddled clay for water retention, is of archaeological interest, and would also be removed. An accommodation bridge crossed the canal, when the latter was in use, its eastern edge within the footprint of the new Waste Sorting and Transfer Facility building (WSTF). The bridge abutments may survive below ground level, and are also of archaeological interest. Trench foundations would also remove locally earlier buried archaeological features.

In general terms, piled foundations, as a series of point impacts rather than the linear impacts of trench foundations, would remove less of the structure of the canal, canal bridge and archaeological features. However a dense piling pattern may still bring about considerable archaeological disruption.

Driven (hammered/ vibrated) piling can cause much distortion of archaeological layers and damage to fragile artefacts such as prehistoric or Roman pottery. Drilled piles would involve a lesser footprint of disturbance at depth. In all cases, any earthworks for construction of a piling mat, excavations for pile caps and ring-beams may reduce the uppermost parts of archaeological features and structures, and to a greater depth if excavations to create them are begun from a level beneath the concrete raft.

To conclude this section, excavations for construction of the ERF bunker, underground drainage structures, and new building foundations will remove buried archaeology. Buried archaeological features are not expected to be of national importance; the impact of both trench foundations for the new buildings and a drilled-pile foundation design is preferred in that it would cause less disruption to surviving ancient archaeological features and to the buried structure of the canal and canal bridge.

The scope of necessary archaeological investigation and recording (as mitigation) will need to be defined in relation to the density of piling, earthworks and other excavations.

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