



Historic England

Mr Chris Bartlett  
West Sussex County Council  
County Planning, 2nd Floor Northleigh  
County Hall  
Chichester  
West Sussex  
PO19 1QT

Direct Dial: 0207 973 3642

Our ref: P01208738

16 September 2020

Dear Mr Bartlett

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

**FORD CIRCULAR TECHNOLOGY PARK, FORD ROAD, FORD, ARUNDEL BN18  
0XL  
Application No. WSCC/036/20**

Thank you for your letter of 8 July 2020 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.

**Impact upon Setting**

The proposed height and massing of the development is considerable and would represent an unusually tall structure upon the coastal plain. It therefore has the potential to impact upon the setting of heritage assets, historically important viewpoints, and the general historic landscape character, over a wide area.

Impact upon settings of Listed Buildings

a) St Andrew's Church, Ford

We have serious concerns regarding the impact of the proposed waste facility on the significance of the Grade I St Andrew's church (Ford) through changes to its setting.

St Andrew's is notable as a largely Norman two cell church with a later chancel, 14<sup>th</sup> century belfry and a distinctive brick Dutch gabled south porch which was added in 1637. The wide open rural landscape surrounding the church forms part of its setting and this plays an important contribution to its significance as it highlights the isolated nature of the church.

The visualisation submitted at viewpoint 14, to the east of the church on the bank of



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the river, indicates that the proposal would have a significant impact on the rural character of the church's setting. The proposed buildings would rise high above the existing treeline, with the stack rising even further. The design and scale of the buildings are of particular concern. The monolithic character of the buildings and their height would greatly reduce our appreciation of the wide, open rural landscape surrounding the church.

The ES notes that the existing buildings at the site and other buildings such as the prison and the houses of Nelson Row are visible as part of the developed area within this view. We think however, that these are largely subservient to the tree line and remain relatively unobtrusive within the church's setting. We agree with the ES's conclusion that the proposal will have a 'permanent substantial adverse effect' to the qualities and character of the setting of the church (10.105), and we therefore have serious concerns regarding the impact to the church's significance.

We note that only one viewpoint has been provided of St Andrew's church and we think that further visualisations from within the churchyard looking westwards towards the site are necessary to understand the full impact of the proposal on this heritage asset.

#### b) St Mary's Church, Climping

There may be further, lesser impacts on St Mary Climping (Grade I), although a lack of visualisations of this makes it difficult to assess.

The medieval church is of significance for its historical and architectural value as a large rural medieval church set within a walled churchyard. Its wider rural setting is still somewhat appreciable, despite the modern industrial development on the former airfield to the west, which is partially obscured by trees.

Although a viewpoint has been provided, no visualisation has been submitted as part of the application, and we think that this is necessary to understand the level of harm that the proposal would have on this asset. We do not think that it is possible to ascertain as the ES has done, that the 'proposed development will not alter the qualities and character of the setting' of the church at Climping. We therefore encourage the applicant to provide a visualisation from this viewpoint so that the impact can be adequately assessed.

#### c) Grade II listed buildings

It is not within Historic England's remit to comment on proposals' impacts to Grade II listed buildings through changes in their setting, and we defer to the conservation officer on these matters.



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However, we would briefly note that the proposal is in close proximity to Atherington House, a late 17<sup>th</sup> to early 18<sup>th</sup> century farmhouse, whose setting largely comprises of open rural landscape, albeit somewhat marred by the existing industrial buildings on the proposal site. We note that while a viewpoint is provided (number 26) a visualisation has not been submitted from this location. However, we think that the height, design and scale of the building as well as its proximity would have a negative impact on the listed building through changes to its setting, and that this would be towards the higher end of less than substantial.

### Impact upon Conservation Areas

We think that the proposal would also have an adverse impact on the conservation areas of Church Lane at Yapton and Lyminster through changes to their rural settings.

Viewpoints and visualisations 24 and 36 indicate that the proposal would be extremely visible in from the fields bordering the conservation areas and would intrude on the low, rural landscape that form the village's wider rural setting. However, while it is clear that the proposal would have an impact on the setting of the conservation areas, visualisations from within these conservation areas are lacking. It is therefore difficult to assess the full extent of the impact to these conservation areas without these.

### Impact upon setting of Scheduled Monuments

The development also has the potential to impact upon the setting of a number of scheduled monuments in the vicinity.

These monuments are Climping Deserted Medieval Settlement (List Entry Ref: 1005828), and Tortington Augustinian Priory (List Entry Ref: 1021459). The significance of both of these monuments derives at least in part from their retention of predominantly undeveloped and rural surrounds, the character of which may be impacted depending on how visible the new development appears within them.

We acknowledge that existing vegetation and development exist between the development and both Climping's historic core and Tortington Priory. However we also note that no visualisations have been provided to assess or demonstrate exactly how prominent the development might be from these designated assets. Without such, it is not possible to determine the development's precise level of impact.

### Impact upon the setting of Arundel and heritage assets within it

The development also poses potential harm to the setting and appreciation of Arundel and some of the heritage assets within it.

Historic Arundel - itself designated a Conservation Area - contains a number of



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designated heritage assets, including the scheduled and listed Castle and grade I listed cathedral. The broad expanse of coastal floodplain that lies directly below Arundel to the south - and ultimately extends all the way to the coast - is a very important element of the setting of the whole.

This area would always have been a marginal hinterland exploited for its resources and most importantly as a means of access and transport to the sea; first as a sea inlet and later as a marshy estuary through which the river Arun flowed. As such the retention of this plain as an open and undeveloped area (and the preservation of unimpeded views across it) contribute significantly to an understanding of the town's historic past. This landscape is thus not one capable of easily accommodating change.

Although the development would sit on a site already developed and at some distance from Arundel, the introduction of such a large structure in this location thus has the potential to intrude into these highly significant views and detract from our appreciation and understanding of the town, and its relationship with the coast and surrounding landscape.

Visualisation 4 (from low-lying land just south of Arundel) shows that the development site would be a visible intrusion into important southwards views. Whilst the visualisation shows that the development will certainly impinge upon this view, it also shows that - at this low level - it is unlikely to intrude into this view in such a way as to cause a high level of harm.

The development is however likely to be more damaging to heritage significance when viewed from points within the town of Arundel itself, due to its more elevated elevation and thus the increased visibility it affords. Views from Arundel Castle in particular will need to be considered as they are integral to the significance of this most highly graded asset, and because the castle represents the most elevated point within the town.

The importance of these views and the need for their protection is also highlighted explicitly within the local plan for Arun (7.5.9). This states that "views out from [the town] are equally important [as views in]" and that "all views stretching across the river flood plain to the coast from more elevated positions within the town...are worthy of protection...some of them are particularly important as they include a view of the Castle or the Cathedral."

Unfortunately the application does not properly assess or demonstrate the development's impact upon these significant views or the assets to which they pertain. There are no visualisations from the Castle itself or from other significant or high points within the town, e.g. St Nicholas' Church and Arundel Cathedral which also sit at the top of the town along the ridge line. The only visualisation provided from the town (Visualisation 29 from the Roman Catholic Cemetery) is not useful for assessment

because of a tree in the immediate foreground.

### Impact upon Historic Landscape Character

The development will also have an impact upon historic landscape character. Whilst the site is already developed, the massing and height of the proposal will comprise a considerable intrusion into views across the surrounding landscape which - to the north at least - retains as a largely open, undeveloped and rural character; a survival of medieval and post-medieval field systems and use.

### **Impacts to undesignated archaeology**

The development also has the potential to impact upon undesignated archaeological remains, including deposits of geo-archaeological interest.

Your main advisor for this element of the historic environment should be the West Sussex County Council Archaeologist, John Mills. However please note that the Historic England Science Advisor is available to advise the WSCC Archaeologist on archaeological science issues, if required.

### **Relevant Policy**

The NPPF requires that heritage assets should be conserved in a manner appropriate to their significance (para. 184), and that great weight should be given to the conservation of the significance of a designated asset (para. 193). Any conflict between an asset's significance and a development proposal should thus be avoided and minimised. This includes any impact the development may have upon the asset through impact upon its setting (para. 190).

The NPPF also requires that planning applications for proposed developments should describe the significance of any heritage asset affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and sufficient to understand the potential impact of the proposal on their significance (para. 189).

In determining applications, local planning authorities should also take account of the desirability of new development making a positive contribution to local character and distinctiveness (NPPF, para. 192).

The Local Plan for Arun also states that "designated heritage assets and Conservation Areas will be given the highest level of protection [and] development likely to prejudice any of the above, including their settings, will be refused" (Policy HER SP1).



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## Position and Recommendations

We note that the development's impact upon the setting of some heritage assets has not been sufficiently assessed to allow us to determine the development's overall impact.

We therefore recommend that this application is not determined until sufficient further assessment has been submitted (NPPF, para. 189).

In particular, there is a need for further visualisations of the development from:

- St Andrew's Churchyard;
- Climping's historic core (the church and scheduled monument);
- Within Yapton and Lyminster conservation areas;
- Tortington Priory;
- Assets within Arundel (including Arundel Castle and other elevated points within the town of heritage significance).

We nevertheless do already have concerns about the proposal. Where impact to setting has been adequately assessed, it is clear the development will have an impact upon assets' significance; and for some assets this level of harm is likely to be high.

In this respect, we think the proposal may fail to meet the requirements of the NPPF (paras. 184, 190 & 192). Nor does it align with the policies of the Local Plan for Arun (Policy HER SP1).

Finally, we recommend that you take the advice of the WSCC County Archaeologist with regard to the proposal's impact upon undesignated archaeology. Please also note that the Historic England Science Advisor is available to advise the WSCC Archaeologist on archaeological science issues, if required.

Yours sincerely

### **Maria Buczak**

Assistant Inspector of Ancient Monuments  
E-mail: [maria.buczak@HistoricEngland.org.uk](mailto:maria.buczak@HistoricEngland.org.uk)

cc: Isabelle Ryan, Assistant Inspector of Historic Buildings and Areas, Historic England

