

WEST SUSSEX COUNTY COUNCIL – PLANNING SERVICES

Environment & Heritage Team – Response to consultation by County Planning

ARCHAEOLOGY comments

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

FAO: - Andrew Sierakowski, County Planning

DATE: 4th May 2021

Consultation date: 13th April 2021

REF.: WSCC/011/21

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.

RECOMMENDATIONS:

An objection is raised to the development on heritage grounds, due to the severity of the impact on the settings of heritage assets, including Grade II Listed Buildings to the south of Ford Lane, in particular the Grade II Listed, Atherington House. Further afield the negative impact of the scheme would harm the significance of the Grade I Listed St Andrew's Church, Grade I Listed Arundel Castle (also a Grade II* Registered Park/Garden), the Grade I Listed Church of St Nicholas, the Grade I Listed Arundel Cathedral and the Arundel Conservation Area. The scheme has potential to result in further harm to the Yapton Conservation Area and the Grade I Listed Church of St Mary. The result would be varying degrees of less than substantial level of harm to the significance of these heritage assets.

Policies: National Planning Policy Framework, paragraphs 192, 193, 194, 196 and 200; 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, 30/4/2021).

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

Built Heritage

The proposed scheme includes the construction of an 8m high berm and the introduction of a visual screening of trees. The scheme proposes an 85 metre chimney stack with the highest element of the buildings being the 38.50 metre boiler hall parapet. The berm and screening measures are insufficient to mitigate the harmful visual impact of the development on the setting of numerous designated and non-designated heritage assets. The detrimental impact on the rural character of the area, which forms the setting to these heritage assets, and the long distance from which the impact of the development would be visible is of concern.

The Zone of Theoretical Visibility (ZTV) shown in the Environmental Statement includes numerous heritage assets, both designated and non-designated. The comments below focus on various designated heritage assets within the 1km study area that are likely to be most susceptible a detrimental visual impact resulting from the scheme. In addition, the more significant assets in Arundel are also included, which due to their heritage value and their elevated position in the landscape, will be susceptible to a harmful visual impact to their setting. Grade I Listed buildings are considered to be of exceptional interest and only 2.5% of all listed buildings are Grade I. Grade II* designated heritage assets are particularly important and of more than special interest and only 5.8% of listed buildings are of Grade II* status. Grade II buildings are of special interest; 91.7% of all listed buildings are in this class.

A series of viewpoints are presented in the Environmental Statement and whilst a model has been used to indicate the visual impact in some of these views, it seems that the model has not been used in others, such as Viewpoint 11 and 30. Therefore, it is not possible to fully assess the impact of the scheme on the wider open landscape, which forms the setting of the numerous heritage assets within the study area. The viewpoint map also has a low definition and it is difficult to see exactly where some of the viewpoints are located. With the potential for substantial detrimental impacts on the settings of numerous heritage assets, the clear indication of the precise location of views which have been assessed, is imperative.

There are numerous public foot paths within the area around the site and these often afford an exceptional opportunity to appreciate numerous heritage assets within their wider, rural landscape setting. Various viewpoints shown in the Environmental Statement taken from public footpaths indicate the high overall level of harmful visual impact the scheme would have on this rural landscape setting, to the detriment of the significance of heritage assets.

Viewpoint 26 gives some indication of the scale of the development within the setting of the Grade II Listed, Atherington House (UID: 1233927), which dates to the seventeenth to eighteenth century. The height and mass of the development would have a considerably detrimental impact on the setting of the Listed building, being dominant in views of the Listed building from Ford Road and the north, west and east. The pastoral character of the Listed building's setting would be severely eroded by the scheme. The development would also dominate the view from the Listed building to the south. The impact would not only be visual, but there is the potential for harm to the setting resulting from environmental factors, such as noise, dust, fumes, light and

vibration from increased traffic. The result would be a severe or high level of less than substantial harm to the significance of the Listed building. The reduction of the market value of the house as a result of the development, and the subsequent difficulty in its ability to sell as a desirable residential dwelling in the future, has the real potential to put the long-term conservation and future viable residential use of the Listed building in jeopardy. The proposed berm and screening would be ineffectual in reducing the level of harm resulting from the development.

The visibility of the site looking west, from the car park of the Grade I Listed St Andrew's Church (List UID: 1233989) is indicated in Viewpoint 23. While the buildings of the site are obscured by mature trees in this view, the chimney stack would be clearly visible and create a visually prominent, enduring and harmful feature within the setting of the listed building, resulting in a less than substantial level of harm to its significance.

The area of Climping to the southeast of the site, has a cluster of designated heritage assets, including the Grade I Listed medieval Church of St Mary (List UID: 1027640) and the adjacent medieval earthworks (Scheduled Ancient Monument List UID: 1005828). There has been some modern industrial development within the wider rural setting of these heritage assets, but its pastoral character is currently still very much appreciable. Viewpoint 25 looking north from Church Lane suggests that the development would not be visible due to intervening vegetation. This lack of visibility would endure for as long as the effective screening of mature trees lasts.

To the west of the site the settlement of Yapton contains a large grouping of designated heritage assets, including the Grade I Listed, twelfth-century Parish Church of St Mary (List UID: 1237782), which is within the Yapton Conservation Area. While viewpoints 24, 35 and 38 are within the vicinity of Yapton, there appears to be no assessment of the visual impact of the scheme specifically on the Grade I Listed church, in particular views of the church within its open landscape setting to the south and north. The eastern boundary of the churchyard provides a screen of vegetation. Yet there are numerous public footpaths (such as Path Number 359 and 359 to the north and of the Church respectively), which will allow the Conservation Area and the Grade I Listed church to be appreciated within their setting. Further study would be needed in order to assess the full visual impact of the new buildings and the chimney stack on the wider setting of the Grade I Listed Church and the Conservation Area as a whole.

Further afield, the settlement of Arundel is on an elevated position on the edge of the South Downs, with the more significant and prominent heritage assets being the Castle (List UID: 1027926), Arundel Castle Park (List UID: 1000170), Arundel Cathedral (List UID: 1248090) and St Nicholas' Church (List UID: 1027914). These highly important heritage assets are a Scheduled Monument and Grade I Listed Building, a Grade II* Registered Park/Garden, and Grade I Listed Buildings respectively. The Castle, its environs and the historic core of the town are designated as a Conservation Area. Viewpoints 4, 31, 29 and 19 are relevant to the town of Arundel and show that the scheme would be visible from the Castle, London Road in the vicinity of Saint Nicholas' Church and the Cathedral. Due to its height and size, the proposed development and the stack would be visible in intermittent views from within the Conservation Area, with a low level of harm to the significance of the town's setting.

The view from the Grade I Listed Arundel Castle, towards the coast is of high significance and it is evident from Viewpoint 31 that the development would be clearly visible in views to the south. The development would have a detrimental impact on this view, resulting in a less than substantial level of harm to the significance of the important heritage assets.

With regard to the demolition of the former aircraft hangars on the site, which were built in 1948-51 for the post-war military airfield, a programme of historic building archaeological recording would be appropriate. This should include photographic recording, drawn plans and sections, an analytical description, accompanied by the results of documentary archive research, to allow an understanding of the historical context, development and use of the structures within their setting.

Paragraph 192 of the National Planning Policy Framework (NPPF) states that when determining applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation. In addition, the local authority should take into account the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 193 of the National Planning Policy Framework (NPPF) states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. The high importance of some of the heritage assets impacted by the proposed development therefore requires great weight to be given to their conservation.

Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Paragraph 200 of the NPPF 20 obliges local planning authorities to look for opportunities for new development within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably. The proposed development would have a wholly detrimental impact on the setting of the heritage assets and a detrimental impact on their significance.

The NPPF states in paragraph 196 that 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, where appropriate, securing its optimum viable use.

The proposed development would have a negative impact on several heritage assets, due to the inappropriate nature and size of the development within their settings. This includes the settings of Grade I, II* and II Listed heritage assets and two Conservation

Areas. The character of the existing setting of many of the heritage assets is primarily rural, but the introduction of a prominent, industrial complex, including an 85 metre tall chimney stack, would have a permanent adverse effect on this setting, resulting in less than substantial harm to their significance. The landscaping and screening mitigation measures would be ineffectual in reducing this level of harm for any of the heritage assets affected.

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.

The known below-ground archaeological remains include a 300-metre long section of the early 19th-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. Geophysical survey as part of the outline planning permission for the adjacent The Landings housing development has established the survival of below-ground prehistoric and Roman features as well as the canal within the area of the former Airfield. Areas of archaeological features of Iron Age and Roman settlement, were 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. A watching-brief on an access road to the Ford Circular Technology Centre identified surviving prehistoric archaeological features as well as a substantial collection of Mesolithic and Neolithic flints.

A geoarchaeological study of the area utilising the evidence from the existing boreholes for the site has identified that the site overlies both raised beach deposits and an area of alluvium. The latter maybe derived either from an earlier iteration of the River Arun or from marine incursion, its full extent is not known. These deposits have archaeological potential for the Palaeolithic period and past environments. The Cultural Heritage chapter has variously suggested that they are of Low to Moderate significance, however this has not yet been appropriately established and the Geoarchaeological DBA submitted by the applicant has suggested that they have the potential to be of High geoarchaeological potential. They lie at varying depths and are of varying thickness, but at their shallowest they range between 0.5m and 1.5m, and will be clearly impacted on by the scheme, particularly the 4m deep bunker facility and the 2.5m general reduction of site levels. A programme of further work will be required in order to support the planning application and inform the development of an appropriate mitigation strategy.

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 19th 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 the site would be built over or cut through by underground drainage structures. In terms of canal related mitigation, it has been proposed that the line of the canal is marked in blue on the carpark and by a rectangular pond in a break in the western landscape bund which echoes the line of the canal as well as an explanatory heritage notice-board. Whilst this recognition of the location of the canal is welcome, the construction of this pond will in itself disturb the below ground deposits relating to the canal and will require a programme of archaeological mitigation comprising excavation and recording.

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 19th-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 belowground 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-20th 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. The majority of the buried archaeological features are not expected to be of national importance but have the potential to be of regional or local significance. 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.

The precise significance of the geoarchaeological potential of the site has not yet been established. However the geoarchaeological desk-based study has established that there will be significant impacts on this resource and that it has archaeological potential. The ASE study has recommended a programme of test-pitting is undertaken across the site to properly evaluate the nature of these deposits, assess the extent of preservation and to map them in detail and we are in agreement with this. Test-pitting would allow the deposits to be assessed in detail for the presence of artefacts, ecofacts and paleoenvironmental material and inform the development of an appropriate mitigation strategy, this could include preservation in situ.

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