



Historic England

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Our ref: P01422630

14 May 2021

Dear Mr Neave

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

**FORD CIRCULAR TECHNOLOGY PARK, FORD ROAD, FORD BN18 0XL
Application No. WSCC/011/21**

Thank you for your letter of 13 April 2021 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.

Summary

The development will impact upon the setting and significance of multiple heritage assets and upon historic landscape character. We provide a summary of anticipated levels of harm to different assets within the 'Position' section of this letter.

It has not been possible to accurately determine the level of harm anticipated for all assets as insufficient evidence (visualisations) has been provided. The assets lacking assessment are listed within our 'Position' section. We recommend that you request this further information from the applicant. We would be happy to advise further advice on receipt of this information.

We acknowledge that the proposal's impact has been reduced since the last consultation and while we welcome this positive change, we still consider the proposal will cause harm to several heritage assets.

You should also consult your own archaeological advisor (Places Service), about the proposal's impact upon undesignated archaeology. The Historic England Science Advisor is available to advise the Places Service on archaeological science issues, if required.



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Historic England Advice

Previous Advice

We provided comments about this development on 16 September 2020 (WSCC/036/20). At that time, we raised concerns about the wide-reaching impact that it would have upon heritage significance.

This impact was predominantly a result of the very considerable height, massing and out-of-keeping built form of the proposed development. This would make the development an unusually tall structure upon the coastal plain, and one which would be intrusive within many historic settings, and out of character with the general historic landscape character.

We also raised concerns about the lack of assessment of this impact and requested that further visualisations be provided from specific heritage assets.

Changes to the development proposal

A new application has been made and the design of the development has undergone some alterations:

- Reduction in height and amount of built form. The stack will remain at 85m but other built form will be reduced from a maximum height of 51.2m down to 38.5m (above ground level). This is possible through reconfiguration of the design, and by constructing some taller building elements partially below ground.
- Creation of bunds and landscape planting to conceal the lower part of the development.
- Re-design of the built form to better blend into the landscape. This includes a horizontal flat roofscape and colour and texture changes.

Within the Planning Statement, the applicant has also provided an explanation of the need for the facility, and reasoning for why they consider the height and scale of the built form cannot be further reduced.

The applicant has provided some further visualisations. They have also provided some explanation of heritage interpretation measures and enhancements that will be provided as part of the development (Planning Statement: 7.57; 7.292; 7.293).



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We provide comments below on the impact of the revised proposal upon the area's heritage significance.

Impact upon settings of Listed Buildings

a) St Andrew's Church, Ford

We previously had 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. This was because the previous proposal would have had a significant impact on the rural character of the church's setting. We asked for further visualisations from within the churchyard looking westwards towards the site to understand the full impact of the proposal on this heritage asset.

St Andrew's is notable as a largely Norman two cell church with a later chancel, 14th 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 and its origins as a rural parish church.

The ES concludes that the proposal would have a 'permanent moderate adverse effect'. This is in comparison to the 'permanent substantial adverse effect' to the qualities and character of the setting of the church which was concluded for the last scheme. This is due to the reduction in scale of the design and repositioning of the massing.

It is difficult to ascertain the level of harm using the information provided. A visualisation from a slightly different viewpoint further south along the river has been provided instead of the same one used in the 2020 proposals. It is therefore difficult to compare the relative harm caused by the new proposal. Additionally, no additional visualisations have been provided, despite the fact that these were requested by us.

b) St Mary's Church, Climping

In our previous letter, we requested visualisations from St Mary's Church, Climping to understand the impact from the church. A wireframe has been produced, and we agree with the ES that there is no impact to St Mary's Church, Climping.





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.

However, we would note that the proposal is in close proximity to Atherington House, a late 17th to early 18th century farmhouse, whose setting largely comprises of open rural landscape, albeit somewhat marred by the existing industrial buildings on the proposal site. 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. We consider that this would be towards the higher end of less than substantial harm under the terms of the National Planning Policy Framework (NPPF).

Impact upon Conservation Areas

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

a) Yapton Church Lane Conservation Area

The Yapton Church Lane Conservation Area covers a small group of well-spaced out houses and the medieval church. This area covers the medieval core of the village, and the former manor, all of which lies on the northern periphery of Yapton and borders onto fields. Its character and significance primarily derives from the variety of age and material of the buildings which indicate Yapton's development, their dispersed layout and the high flint and brick walls which enclose them. The fields to the east of the church provide a wider rural setting to the church, although this is relatively physically separate from the core of the conservation area.

Visualisation 24 indicates that the proposal would be extremely visible in from the fields bordering the conservation area and would intrude on the low, rural landscape that form its wider rural setting. However, while it is clear that the proposal would have an impact on the setting of the conservation area, visualisations from within this conservation area are lacking, particularly from the church. We note that the ES predicts 'no visibility of the development from the church or churchyard' (paragraph 10.104). We think that it is likely that the potential level of harm is relatively low, but it is difficult to assess the full extent of the impact to the conservation area and church



without visualisations to accompany this statement.

b) Lyminster Conservation Area

Lyminster Conservation Area covers the small village of Lyminster, which is characterised by the dispersed nature of its buildings located behind large flint and brick walls. There is a sense of enclosure enhanced by the layout of the roads and buildings, which is in contrast to its wider setting of the flat floodplain with views over to Ford and Arundel.

Visualisation 12 indicates that the proposal would be visible from the floodplains to south-west of Lyminster Conservation Area. The scale and massing of the proposal, while reduced, would nevertheless still intrude on the low, flat landscape that forms the village's wider floodplain setting. We think that this would cause some visual intrusion on the rural setting of the conservation area. We therefore do not agree with the ES which states that there would be 'no effects' predicted (paragraph 10.122) and consider that there would be a low degree of harm caused.

Impact upon setting of Scheduled Monuments

The development has the potential to impact upon some scheduled monuments, through impact upon their setting. These monuments are: Climping Deserted Medieval Settlement (List Entry Ref: 1005828), and Tortington Augustinian Priory (List Entry Ref: 1021459).

These monuments have predominantly undeveloped and rural settings, and we consider that the intrusion of a large new development of industrial character would detract from these settings. Within the original application, it was unclear how prominent the development might appear from these assets and to what extent it might impact upon their settings. We therefore requested visualisations from each monument.

a) Climping Deserted Medieval Settlement

A visualisation has been provided from the historic core of Climping (Viewpoint 25), which demonstrates that the development would not be visible from this point due to intervening vegetation and development.

There are in fact two separate areas protected by the scheduling. We consider that



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Viewpoint 25 is broadly representative of the view from the southern-most scheduled area, which lies just behind Viewpoint 25. We therefore agree that the development would not be visible from this part of the scheduled monument and would not impact upon its rural setting.

There is however another scheduled area to the north-east of Viewpoint 25, and the impact of the development upon views from this area is therefore not represented by Viewpoint 25.

Whilst we acknowledge that intervening vegetation and development exists between the development and this northern scheduled area, we think it is likely that it would nevertheless be visible and intrusive within its setting. This is considering the size of the built form and its location just 1 km to the north-west. This supposition is supported by the ES itself which confirms that the development will not be visible from St Mary's Church "though it is predicted to be visible from the fields to the north and east" (10.104).

The failure to provide a representative visualisation means that the impact upon the setting of this part of the scheduled monument (and thus the monument as a whole) cannot be accurately determined. However, from the information available, we consider that it is likely to experience at least some harm.

This contrasts with claims within the ES which predict no effect to this scheduled monument (10.111). We presume this conclusion was reached because it failed to consider that the monument comprises of two distinct areas.

b) Tortington Augustinian Priory

Despite our requests, a visualisation from this scheduled monument has not been provided. The closest visualisation is over 1 km away to the south-west (Visualisation 28). Although a rural character still dominates this view, the development is visible as a dominant feature against the skyline; it is intrusive within the view and in contrast to the otherwise rural landscape character.

We acknowledge that the scheduled priory is surrounded by denser vegetation than Visualisation 28 and is also further from the development site. Its impact is therefore likely to be less than that experienced from Visualisation 28. Although we cannot accurately determine level of harm without a representative visualisation, we therefore think it is unlikely to experience more than a low level of harm.

The ES predicts no effect to this scheduled monument (10.123). This may be true; however, we argue that level of harm cannot be accurately determined in the absence





of a representative visualisation.

Impact upon the setting of Arundel and heritage assets within it

The development would cause less than substantial harm to the setting and appreciation of historic Arundel (a Conservation Area) and some of the heritage assets within it (including the scheduled and listed Castle, and grade I listed cathedral).

The broad expanse of the 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 town's historic setting

Its flat and undeveloped character - and the absence of any development that intrudes significantly into the skyline (Viewpoint 31) - are important in views from the town as they aid understanding of the historic character and use of this area in the past. That is: as a marginal hinterland and sea inlet (later a marshy estuary) that provided the primary means of access and transport to the sea and was thus integral to the town's development and wealth.

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. The landscape is not one capable of easily accommodating change.

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."

We requested visualisations of the development from the Castle and other significant or high points within the town (e.g. St Nicholas' Church and Arundel Cathedral) in order to understand the degree to which the development might affect their settings.

a) Visualisations provided

Only two visualisations have been provided: one from the cemetery on London Road (approximately 100m west of Arundel Cathedral) (Visualisation 29) and one from the battlements of the shell keep at Arundel Castle (Visualisation 31).



Both visualisations show the development as a distant yet noticeable intrusion in long views over the floodplain, and one which stands out against the backdrop of the sea. Whilst we acknowledge that the majority of the plain remains untouched in character, the building intrudes clearly into the skyline as no other existing development does and therefore necessarily becomes a focal point, detracting attention from the flat and undeveloped character of the floodplain.

At this point we would also note that these (and other) visualisations portray the development as having quite a hazy outline. Whilst we understand that materials and colour have been chosen to ‘blend’ the development into the sky behind, we are not convinced that it would appear so hazy.

It is also worth noting that it will stand out against some skies better than others as the weather changes (e.g. bright blue versus grey sky). We think that the visualisations may have overstated the degree to which this very large building will ‘blend in.’

For the reasons given above, we think that the development will cause some harm to the setting of historic Arundel and some of the assets within it (notably the Castle). Our conclusions are in contrast to the ES which claims that the castle will experience only a “small - negligible effect” (Environmental Statement, 10.127); whilst the Cathedral and town as a whole will experience no effect.

Impact upon Historic Landscape Character

The development will also have an impact upon historic landscape character (HLC). The local HLC is predominantly open, undeveloped and rural. It is in many respects a survival of medieval and post-medieval field systems and uses. The massing, height and undeniably industrial character of the development will intrude considerably upon this character.

Whilst we acknowledge that the development’s redesign has reduced this impact to some degree, the development remains one of considerable scale and height; the impact of which is not readily capable of mitigation. We think the development will therefore still cause a high degree of harm and have a considerable negative effect on historic landscape character.

Impacts to undesignated archaeology



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The development also has the potential to impact upon undesignated archaeological remains, including deposits of geo-archaeological interest. This impact is likely to have increased following the development's redesign, considering that some elements of the development are now to be constructed partially below ground.

Your main advisor for this element of the historic environment should be Places Service (part of Essex County Council), who are temporarily providing archaeological advice for WSCC. However please note that the Historic England Science Advisor is available to advise Places Service 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).

Paragraph 194 of the NPPF requires that any harm to the significance of a designated asset should require clear and convincing justification.

Where a proposed development will lead to less than substantial harm to the significance of designated heritage assets, this harm should be weighed against the public benefits of the proposal (para. 196).

The effect of an application on the significance of non-designated heritage assets (including buried archaeology) should be taken into account in determining the application (para. 197). Local planning authorities should also require developers to record and advance understanding of the significance of any heritage assets to be lost



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in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible (para. 199).

Finally, 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).

Position

Further visualisations have been provided to assess the impact of the proposal upon the setting of heritage assets. However, we note that the applicant did not supply all visualisations we requested.

Particularly, the visualisations for St Andrew’s Church Ford, Yapton Church Lane Conservation Area, Climping Deserved Medieval Settlement (northern area), and Tortington Priory are insufficient to accurately assess the impact on these assets.

We summarise below the development’s anticipated level of harm to relevant heritage assets (through impact to their setting) where possible, given the information provided. It is important to note that in many cases, we consider the level of harm is higher than that stated within the Heritage Statement.

- St Mary’s Climping - No impact

- Lyminster Conservation Area - Low level of less than substantial harm

- Arundel and assets within it - some harm through intrusion of views out of the town

- Atherington House - High level of less than substantial harm

- Historic Landscape Character - Harm anticipated over a wide area; level of harm anticipated to be high level in places





- Tortington Priory - Insufficient evidence to accurately determine; we anticipate no more than a low level of harm
- Yapton Church Lane Conservation Area - Insufficient evidence to accurately determine
- Climping Deserted Medieval Settlement - Insufficient evidence to accurately determine
- St Andrew's Ford - Insufficient evidence to accurately determine.

We acknowledge that impact has been reduced to some extent since the last consultation, through redesign. However, the impact of a development on this scale is not capable of being easily reduced or mitigated.

Recommendations

We recommend that you request the applicant to provide further visualisations in order to properly understand level of harm to the heritage assets listed above (NPPF, para. 189).

We would be pleased to provide further advice when this information has been provided. Following this, your authority will need to consider whether all harm has been minimised and whether that which remains is clearly and convincingly justified (NPPF, para. 190 & 194). This should include consideration and assessment of the applicant's comments regarding the need for the facility in this location, and the requirement for a facility on this scale.

If these requirements are met, you should determine the application in accordance with the Local Plan for Arun (Policy HER SP1); and by weighing the development's harm to heritage significance against the public (and heritage) benefits of the proposal (NPPF, para. 196).

Finally, we recommend that you take the advice of the Places Service regarding



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impacts to undesignated archaeology. Please also note that the Historic England Science Advisor is available to advise the Places Service on archaeological science issues, if required.

Yours sincerely

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