

WEST SUSSEX COUNTY COUNCIL – PLANNING SERVICES

Environment & Heritage Team – Response to consultation by County Planning

ARCHAEOLOGY comments

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DATE: 22/6/2021

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.

COMMENTS:

Following discussion with planning officers, our original response of 13th April 2021 has been reviewed and further clarification on the expected level of harm for all heritage assets is now set out as below:

The amendments to the assessment have been informed by a review of the WSCC/096/13/F New Circular Technology Park (former Ford Blockworks) permission was granted in 2015. A number of heritage assets were considered, and concerns were raised regarding the visual impact from the 50m chimney stack. The ES Chapter identified low levels of harm to a number of assets including Church of St Andrew (Grade I); Atherington House and New House Farmhouse (Grade II); Yapton Conservation Area; Church of St Mary, Yapton (Grade I); Church of St Mary, Climping (Grade I); Scheduled medieval earthworks, Climping; Arundel Castle (Scheduled Ancient Monument and Registered Park and Garden).

Concerns were raised in 2014 by WSCC Archaeology and Arun Council with regard to the visual impact. Arun Council noted the justification for the visual impact was accepted. The committee report (dated 3 June 2013) noted: *The proposed development is considered to be of an acceptable scale and design, consistent with the immediate environs, and would not give rise to unacceptable impacts upon the character of the area, heritage assets, or wider landscape.*

Since the development was granted in 2015, there have been updates to national planning guidance, particularly Historic England's GPA3, which informs our

understanding of how development can impact the significance of heritage assets. The methodology set out in the Appendix details GPA3.

Whilst it has been found that there will not be substantial harm to an individual asset, there are varied levels of less than substantial harm. The following is set out as a scale of low, medium and high levels of less than substantial harm. Visual impacts have been determined through a cross reference of the ZTV and submitted views and visualisations.

It should be noted that as the 2015 scheme was deemed an acceptable level of visual impact, the applicant should demonstrate that there is no other design solution or layout that could result in less harm, design mitigation has been implied to ensure the harm has been reduced as much as possible. As a result the proposal should be the least harmful option. As noted in GPA3 : *Options for reducing the harm arising from development may include the repositioning of a development or its elements, changes to its design, the creation of effective long-term visual or acoustic screening, or management measures secured by planning conditions or legal agreements. For some developments affecting setting, the design of a development may not be capable of sufficient adjustment to avoid or significantly reduce the harm, for example where impacts are caused by fundamental issues such as the proximity, location, scale, prominence or noisiness of a development. In other cases, good design may reduce or remove the harm, or provide enhancement. Here the design quality may be an important consideration in determining the balance of harm and benefit.*

Asset	ES chapter 10 Cultural heritage – significance	ES chapter 10 Cultural heritage - Magnitude of change	ES chapter 10 Cultural heritage - Overall impact	Description of impact	Amendments	Level of less than substantial harm
Atherington House (Grade II, List Entry Number: 1233927)	(10.100) High	Medium – small magnitude	Moderate adverse	Viewpoint 26 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	The principle of the development has been determined, therefore any impacts from the environmental factors have been agreed. Impacts primarily relate to the visual impacts. There will be visual impact due to the increase of scale and massing of the building and stack that	Low to medium level of less than substantial harm to the significance of the listed building.

				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.	is out of character.	
St Andrew's Church (Grade I, List Entry Number: 1233989)	(10.102) High	Small magnitude	Slight adverse effect	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	The previously consented scheme had a 50m stack which would have had a visual impact. There will be an increase in visual impact through the scale and massing of the building and the height of stack. Whilst mature planting will help to screen visual impacts, this is subject to change.	Low level of less than substantial level of harm to its significance.
Arundel Castle (Grade I, List Entry Number: 1027926) Arundel Castle (Scheduled Monument, List Entry Number: 1012500)			(Technical Summary) slight adverse	Viewpoint 31 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	Technical Appendix F, Part 3: Designated Heritage Assets Beyond the 1km Study Area – show views from the castle. Notes that in its existing form the	Medium level of less than substantial level of harm to its significance.

<p>Arundel Castle (Grade II* Registered Park/Garden, List Entry Number: 1000170)</p>				<p>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.</p>	<p>application site is 'barely identifiable'. Does not assess the impact of proposals.</p> <p>HE response provides an understanding of the contribution made by the setting to the significance of these assets.</p> <p>Forms part of the strategic views towards the coast. Increase in inter-visibility would interrupt these views.</p> <p>Impact through the scale and massing of the building and chimney stack.</p>	
<p>St Nicholas' Church (Grade I, List Entry Number: 1027914)</p>	<p>Not Assessed</p>	<p>Not Assessed</p>	<p>Not Assessed</p>	<p>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</p>	<p>Due to the significance and location of the church, should be considered as part of the Conservation Area. The designated heritage assets within the Conservation Area, make an important contribution to the character and appearance of the Conservation Area. Any harm to the</p>	<p>Grouped with Arundel Conservation Area</p>

				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.	church will arise out of impact to the Conservation Area as a whole rather than separately affected.	
Roman Catholic Cathedral/ (Grade I, List Entry Number: 1248090)	High		No effect	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.	Glimpsed views from the cathedral are likely (ZTV). The cathedral and castle are important landmarks in Arundel. Views of them are also gained from the north (viewpoint 30). The height of the chimney stack will result visual impacts to these views.	Low level of less than substantial level of harm to its significance.
Arundel Conservation Area			No effect	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	Principle of development determined; glimpsed views may be possible, this is likely increased by the larger scale and	Very low level of less than substantial harm to the significance.

				<p>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.</p>	<p>massing. Out of keeping of the character and appearance of the rural setting</p>	
Yapton Conservation Areas			<p>Slight adverse effect (Technical summary)</p> <p>Slight – moderate effect to Church (Technical summary)</p>	<p>Viewpoints 24, 35 and 38</p> <p>Large grouping of designated heritage assets, including the Grade I Listed, twelfth-century Parish Church of St Mary (List UID: 1237782). 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</p>	<p>Principle of development determined – though concerns had been raised regarding the visual impact.</p> <p>Will appear in the rural setting, this is likely increased by the larger scale and massing. Out of keeping of the character and appearance of the rural setting.</p>	<p>Low level of less than substantial harm to the significance.</p>

				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.		
Church of St Mary, Yapton (Grade I, List Entry Number: 1237782)			Slight – moderate effect (Technical summary)		Principle of development determined – though concerns had been raised regarding the visual impact. Will appear in the rural setting, this is likely increased by the larger scale and massing. Out of keeping of the character and appearance of the rural setting.	Low level of less than substantial harm to the significance.
Lyminster Conservation Area			No effect (Technical summary)		Viewpoint 12	Very low level of less than

					Will appear in the rural setting, this is likely increased by the larger scale and massing. Out of keeping of the character and appearance of the rural setting.	substantial harm to the significance.
Church of St Mary, Climping (Grade I, List Entry Number: 1027640)	High			Viewpoint 25 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.	Principle of development determined; intervening development and screening	No harm to the significance
Scheduled Monument – Medieval earthworks E and SE of St Mary's Church (List UID: 1005828)	High	Minor adverse	Slight/moderate	Viewpoint 25 The height of the chimney stack would have a detrimental impact on the wider setting of the Scheduled Monument. However the pastoral character of the monument's	The principle of the development has been determined, therefore any impacts from the environmental factors have been agreed. The impact relates to the visual impact	Low level of less than substantial harm to the significance of the Scheduled Monument

				setting has been previously compromised by both the adjacent HMP Ford prison.	from the monument	
Scheduled Monument – Tortington Augustinian priory and ponds, including part of priory precinct (List UID: 1021459)	High	Minor adverse	Slight/moderate	The height of the chimney stack would have a detrimental impact on the wider setting of the Scheduled Monument. However the settlements of Tortington and Ford, as well as areas of dense vegetation, are located between the monument and the development site.	The principle of the development has been determined, therefore any impacts from the environmental factors have been agreed. The impact relates to the visual impact from the monument	Low level of less than substantial harm to the significance of the Scheduled Monument

In addition, following further discussion with HE, if the LPA is minded to approve the application the following Pre-Commencement conditions are recommended to ensure that an appropriate mitigation strategy is designed and implemented to record both the above and below ground archaeological assets. It will be important that the applicant agrees an archaeological strategy at the earliest opportunity so that the archaeological mitigation requirements can be fully defined as this will be a two stage strategy of field assessment followed by detailed mitigation. There will also be a requirement for the building record of the surviving military structures on the site.

For the built heritage recording it is recommended that the following condition is attached for the recording of the surviving military structures.

Building recording

1. No demolition, conversion or alterations shall commence until a programme of historic building recording has been secured in accordance with a written scheme of investigation (WSI) to be submitted by the applicant and approved in writing by the local planning authority.
2. No demolition, conversion or alterations shall take place until the satisfactory completion of the recording in accordance with the WSI submitted.
3. The applicant will submit to the local planning authority a report detailing the results of the recording programme and confirm the deposition of the archive to an appropriate depository as identified and agreed in the WSI .

This programme of work should preserve by record the surviving elements of the military buildings on the site prior to their demolition.

For the below ground archaeological work it is recommended the following phased condition is attached

Programme of archaeological assessment and mitigation

1. No development or preliminary groundworks of any kind shall take place until a programme of archaeological investigation has been secured in accordance with a written scheme of investigation which has been submitted by the applicant, and approved in writing by the local planning authority.
2. No development or preliminary groundworks of any kind shall take place until the completion of the programme of archaeological evaluation identified in the WSI defined in Part 1 and confirmed by the Local Authority archaeological advisors.
3. A mitigation strategy detailing the excavation / preservation strategy shall be submitted to the local planning authority following the completion of the archaeological evaluation.
4. No development or preliminary groundworks can commence on those areas containing archaeological deposits until the satisfactory completion of fieldwork, as detailed in the mitigation strategy, and which has been approved in writing by the local planning authority.
5. The applicant will submit to the local planning authority a post excavation assessment (to be submitted within six months of the completion of the fieldwork, unless otherwise agreed in advance with the Planning Authority). This will result in the completion of post excavation analysis, preparation of a full site archive and report ready for deposition at the local museum, and submission of a publication report.

The above would include the assessment of geo-archaeological deposits, below ground deposits of prehistoric to medieval date, assessment of the surviving elements of the Portsmouth to Arundel Canal and their future identification and promotion.

Recommendation:

The local authority will need to weigh up whether the public benefit of the scheme outweighs the harm to the heritage assets. Less than substantial harm at various levels were identified to a number of designated assets.

Policies: National Planning Policy Framework, paragraph 196; Adopted Arun Local Plan 2018, Policy HER DM1 (Listed Buildings) (e).

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Appendix

Methodology: Built Heritage Impact

The assessment of the potential impact of the planned development upon the setting of the identified heritage assets has been considered using the guidance detailed in Historic England's *The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning Note 3* (Second Edition December 2017). Step 3 of the staged approach outlines that assessment should:

- Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it.

The guidance recommends that an assessment should consider the following factors when assessing impact:

- Location and Siting
- Form and Appearance
- Additional Effects
- Permanence

The Historic England guidance further expands on these factors by providing a (non-exhaustive) checklist of the potential attributes of a development affecting setting that may help to elucidate its implications for the significance of the heritage asset. These attributes include:

- Proximity to asset;
- Position in relation to relevant topography and watercourses;
- Position in relation to key views to, from and across;
- Dimensions, scale and massing;
- Introduction of movement or activity;
- Diurnal or seasonal change;
- Change to built surroundings and spaces;
- Noise, odour, vibration, dust etc;
- Lighting effects and 'light spill';
- Change to general character (eg urbanising or industrialising); and
- Changes to public access, use or amenity;
- Reversibility.

In order to assess the impact of the proposed development on the significance of the heritage assets, the following assessment provides a comparative analysis of the heritage significance against the 'magnitude of change' (or the scale of proposed changes), the details of which are discussed below. This assessment is based on the criteria set out by the Design Manual for Roads and Bridges (DRMB) (The Highways Agency, August 2007. *Design Manual for Roads and Bridges*, Volume 11, Section 3, Part 2 HA 208/ 07 *Cultural Heritage*) and International Council on Monuments and Sites (ICOMOS), 2010. *Guidance on Heritage Impact Assessments for Cultural World Heritage Properties*, and is a clear way of understanding the magnitude of impact, and how levels of effect vary according to the significance of the heritage asset.

The magnitude of change will be assessed based on the criteria set out in Table 2 below. As a general principle any change resulting in a positive impact should be encouraged.

Table 1: Magnitude of Change

Magnitude of Change	Description
Major Beneficial	The proposed changes will substantially alter key elements of the heritage asset in a positive way, better revealing and/or enhancing its significance. There would be a substantial improvement to the understanding of important elements of the asset's significance.
Moderate Beneficial	The proposed changes will have a considerable positive effect on key elements of the heritage asset, such that they enhance the overall character or significance of the heritage asset. There may be an improvement in key uses and beneficial change (e.g. the creation of coherency) to the significance of the asset.
Minor Beneficial	The proposed changes may cause a minor improvement to the significance of a heritage asset.
Negligible	The proposed changes will have a minimal positive or negative impact on the heritage asset's significance.
Neutral	The proposed changes will have no impact on the heritage asset and its significance.
Minor Adverse	The proposed changes will have minor impact on key elements of the heritage asset, such that the overall significance of a heritage asset is negatively affected. Change of this magnitude may be acceptable if suitable mitigation is carried out.
Moderate Adverse	The proposed changes will have a considerable negative effect on the overall character and significance of the heritage asset. It will likely disturb key features and be harmful to overall heritage significance. Change of this magnitude should be avoided where possible, but can be minimised or neutralised through positive mitigation.
Major Adverse	The proposed changes will cause a substantial disruption to, or, in some cases, the complete destruction of important features of the heritage asset, such that its significance is substantially harmed. Change of this magnitude should be avoided.

The overall impact on a heritage asset, is provided by an equation which considers the level of heritage significance (as defined in the previous section) and the magnitude of change. This is summarised in Table 3 below. This table is a modified version of that provided in guidance from ICOMOS and Historic England.

Table 2: Overall Impact

Criteria		Level of Heritage Significance			
		Neutral	Low	Medium	High
Magnitude of Change	Major Beneficial	Slight	Slight / Moderate	Moderate / Large	Large / Very Large
	Moderate Beneficial	Neutral / Slight	Slight	Moderate	Moderate / Large
	Minor Beneficial	Neutral / Slight	Neutral / Slight	Slight	Slight / Moderate
	Negligible	Neutral	Neutral / Slight	Neutral / Slight	Slight
	Neutral	Neutral	Neutral	Neutral	Neutral
	Negligible	Neutral	Neutral / Slight	Neutral / Slight	Slight
	Minor Adverse	Neutral / Slight	Neutral / Slight	Slight	Slight / Moderate
	Moderate Adverse	Neutral / Slight	Slight	Moderate	Moderate / Large
	Major Adverse	Slight	Slight / Moderate	Moderate / Large	Large / Very Large

In order to assess the potential impact of the proposed development on the relevant built heritage assets, a number of conditions have been considered including topography, inter-visibility, shared views etc. which comprises the settings of the relevant heritage assets and the surroundings in which the assets are experienced. Previous developments within the vicinity, which may have already affected the settings of these listed buildings, have also been considered to understand the impact in the evolving context.

As set out in the PPG: *Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194-196) apply. Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.*