

SOUTH EAST OFFICE

Mr Peter Cleveland
Arun District Council
Arun Civic Centre
1 Maltravers Road
LITTLEHAMPTON
West Sussex
BN17 5LF

Our ref: P00287803

21 November 2013

Dear Mr Cleveland

**Notifications under Circular 01/2001, Circular 08/2009 &
T&CP (Development Management Procedure) Order 2010**

**BEVIN BEVIN & CO LTD., RIVER ROAD, ARUNDEL, WEST SUSSEX BN18 9DH
Application No AB/104/13 and AB/105/13/L**

Thank you for your letter of 21 October 2013 notifying English Heritage of the above application. Thank you for consulting English Heritage on proposals to redevelop the site known as 'Bevin Bevin & Co Ltd' in Arundel town centre. I apologise for my delayed response.

Summary

The ensemble of brewery buildings importantly represents the brewing history of the town and makes a positive contribution to the conservation area. The manner of their proposed conversion for residential accommodation will be harmful to the significance of individual buildings, and to the character and appearance of the conservation area, by eroding the understanding of the historic function of the complex. The proposals would therefore fail to meet the requirements of the NPPF as regards the conservation of heritage assets. The fundamental concept of the conversion should be revisited, to realise a scheme that conserves the special historic interest of the buildings, and enhances the character of the conservation area.

English Heritage Advice

Significance

The site comprises a number of buildings associated with the Eagle Brewery which operated in Arundel from the 18th century until the early part of the 20th century, when buildings were converted for storage use by Bevin Bevin & Co. Ltd., a distributor of household goods. An associated brewery office building, located on Tarrant Road to the north is further evidence of the brewing history in this part of the town.

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The buildings form an interesting and evocative group, which although of disparate quality and condition clearly exemplify their industrial past. This is perhaps most evident in the tall brewery building (grade II listed), constructed in local flint with heavy brick banding, regularly spaced and modest fenestration and a louvered dormer and vent. The building has a dominant presence in the yard, and in longer views within the town, where it, and the varied roofscape of adjacent buildings contribute positively to the character and appearance of the conservation area. Among the ancillary buildings is the gable-ended range attached to the south of the brewery, with the recognisable painted sign indicating its later use, and large tripartite sash windows. Various sheds, walls and other structures around the yard are seen in the waterside context, and along with the office on Tarrant Road, they suggest the industrial history of the brewery, the different functions of which are expressed in the architecture and layout of the complex.

There are very few historic breweries that continue to function in this part of the country, and the buildings of the old Eagle Brewery are an important reminder of this once ubiquitous form of industry, at a time when beer was a staple drink for many. It is also illustrative of local brewing practices, and the evolution of the industry - for example, the way in which functions gradually co-located, so that malting and brewing were carried out at a single site, evidenced here by the louvered dormer and vent in the principal listed building which may have been converted to a malting floor. There is much archaeological potential within the buildings here, given the longevity of the brewery use at this site which could better reveal the history of The Eagle Brewery. We understand the site may also yield evidence of the Roman history of the town, and the advice of the county archaeologist must also be sought in this regard.

Impact

The site has been vacant since the closure of Bevin Bevin & Co. in 2011, and the nature of the use of the site until that point, and the lack of maintenance of buildings since leaves the buildings vulnerable, and deteriorating. The site represents a significant chunk of developable town centre land, and we share the aspiration of the local planning authority to see the site sensitively redeveloped. The proposals seek to convert the principal listed building into three apartments, and the later attached building to the south into a single residential unit. Elsewhere, ancillary buildings would be adapted, or demolished and areas redeveloped to provide a total of six houses, and a further four apartments, with associated car parking and amenity space. The proposals include substantial or total demolition of some buildings, and subdivision, or adaptation of others.

Industrial buildings are often challenging to convert into residential accommodation, which is the case here. Many characteristics of these buildings - for example, the scarcity of windows, deep floor plans, expansive room volumes, non-standard ceiling

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heights, poor vertical circulation, presence of historic features or machinery, raw finishes etc., present intractable problems. To be successful, such a conversion will require a bespoke solution that ensures that the special qualities of the buildings are not unduly compromised, and allow the historic function of the place as a whole to remain legible.

Policy Context

The National Planning Policy Framework places the conservation of heritage assets at the centre of its policies for sustainable development. Heritage assets are irreplaceable, and their significance can be harmed or lost through alteration or destruction. Any such harm or loss should therefore require clear and convincing justification (para.132, NPPF), and where unavoidable, be weighed against the public benefits associated with the proposals. The brewing and malting industries have been the subject of extensive research by English Heritage, and a number of publications are available on our website that may assist your authority in understanding how to assess the significance of these buildings, and judge the level of harm to them. These documents can be found here: <http://www.english-heritage.org.uk/professional/research/buildings/historic-breweries/>

Planning authorities should look for opportunities for new development within conservation areas and 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 or better reveal the significance of the asset should be treated favourably (para.139 NPPF). While planning decisions should not impose architectural styles or stifle innovation through *unsubstantiated* requirements to conform to certain development forms or styles, it is proper to seek to promote or reinforce local distinctiveness (para.60 NPPF).

English Heritage position

We are aware that this proposal follows extensive pre-application discussions with the local planning authority, and that the principle of converting the site for residential use has been accepted. The current application has submitted with it a good analysis of the buildings, their historic functions, and the features that have been identified as contributing to their special interest. Unfortunately, this analysis does not appear to have informed the proposals for conversion, which appear to us to be a very standardised, 'one size fits all' approach across the buildings. We would also comment generally that the level of detail submitted with the application falls short of what would normally be expected for such a complex proposal. We would expect for example, existing and proposed sections to be submitted, and a greater level of detail on internal finishes, insulation, fenestration, method of demolition, method of repair of external walls, hard and soft landscaping etc. While much of this could be controlled by condition, such elements are likely to have an impact on the special interest of the

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buildings, and would be better provided up front.

We are particularly dismayed by the way in which the listed building (Building 1) and its attachments, (Buildings 2 and 3) are proposed to be converted which would involve removal of staircases, compartmentalisation of rooms for bedrooms and bathrooms, and subdivision of spaces which currently flow naturally one from another. This will not only harm the significance of the buildings as derived from their volumes, but also erode the understanding of the complimentary functionality of buildings. Some revisions could be fairly easily made - for example by removing the domesticating 'Juliet' balcony to the taking in doors on the east elevation, or in a more imaginative solution to the requirements for en-suite bathrooms. However, in some instances a more fundamental re-think is necessary: for example, could staircases be retained but sensitively adapted to comply with fire regulations, providing fire compartmentalisation elsewhere? Would it be possible instead of hiving off part of the second floor of Building 1 for a bedroom to instead install a mezzanine floor, so that the volume of the space can still be appreciated? Within 'Building 2' the insertion of a bathroom and toilets on the partition walls adjacent to the chimney breast is clumsy, and should be re-visited.

The loss of the southernmost range of 'building 4' as identified in the heritage statement is regrettable. We understand that this building presents challenges for conversion because of the depth of the floor plan, and the need for natural daylight to units; however it is identified within the heritage statement as being highly significant. This building is identified as the 'Tun Room' and as such represents an important part the brewing process. It has a number of interesting surviving features, including original stone and brick floor finishes, cast iron columns, and barrel storage areas, and louvered windows, and it is unclear how much of this will be retained, or be expressed in the final finishes of the building. If the local authority is minded to accept the loss of the southernmost range, and the subdivision proposed, it will be important that stringent recording conditions are imposed. Extensive glazing is proposed in the new southern elevation of buildings 5, 6, and the east and west elevations of building 7, albeit partly concealed behind enclosed boundary walls. This approach is a significant departure from the character and appearance of the existing 'sheds', and should be rationalised.

As regards the demolition or adaptation of buildings 5, 6, 7, 8 and 9, we similarly have concerns that some elements of the conversions are insensitive and would erode the understanding of relationships between buildings within the yard, but accept that they are of a lower order of significance than others. Building 11, logically assumed to have been used for storage or barrels and/or vehicles is recognised as having some significance, largely we suggest in the characterful walls, and the archaeological potential within them. The barrel vaulted steel roof is of limited intrinsic value but

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nevertheless contributes to the miscellany of roofs and materials here.

The proposed design concept, which uses the existing roof form as its design cue, is not in itself objectionable, however, while the arc of the existing roof has been used, it has been pivoted so that the roof would be much higher than the existing shed, sitting high above the boundary wall of the site, with again extensive glazing and balconies proposed, which do not conform to the industrial character. If the floorspace required cannot be achieved within the constraints of this design, it may be preferable to adopt the warehouse typology of pitched roofs and traditional materials elsewhere on the site, in order that roofs can be kept lower, and be less intrusive to the conservation area.

Finally, the redevelopment of building 12 is not of concern to us, provided that the boundary wall behind is appropriately repaired and retained. The proposed development takes the form of an undercroft for parking, with living accommodation above. This is indicated as being supported by slender columns, which while having the advantage of allowing views through to the boundary wall, has the peculiar result of the accommodation above apparently 'floating'. We suggest that a more deliberately solid construction would better enhance the character of the conservation area. The eaves line could we feel also be reduced so as not to protrude above the boundary wall.

Recommendation

The proposals in their current form would cause harm to the significance of designated and undesignated heritage assets which would not be outweighed by the public benefits of the proposals. We recommend that the application is withdrawn and amendments sought, or refused in its current form.

Yours sincerely



Samantha Johnson

Inspector of Historic Buildings and Areas



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