



Jason Clemons

Mr Michael Eastham
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF

E-mailed letter only

28 January 2021

Dear Mr Eastham,

AB/135/20/OUT – LAND AT FORD ROAD, ARUNDEL

I am writing further to the response dated 18 January 2021 from Historic England (HE) to the above planning application.

We agree with HE that the relevant heritage assets that need to be considered with regard to this application are the Tortington Priory Scheduled Monument and the Grade II* listed Priory Barn. The Heritage Statement (November 2020) provided by Savills in support of the planning application identifies these two heritage assets, as well as others, including Arundel Conservation Area and Arundel Castle. We agree with HE that the site falls within the setting of these heritage assets and therefore that it is necessary to identify whether and, if so, to what extent the site contributes to their significance.

The Heritage Statement identifies the significance of the identified heritage assets in Section 4 and assesses the impact of the proposals upon that significance in Section 5. The Statement concludes that because of the careful design of the proposed development layout, the setting of the Tortington Priory complex and the setting and views of the town will not be harmed.

The Statement has correctly identified the significance of the heritage assets, the contribution made by the site to these assets, and the effect of the proposals upon that contribution to significance. This assessment has been undertaken in accordance with Historic England guidance and the requirements of the NPPF. It is a proportionate assessment in line with Paragraph 189 of the NPPF.

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HE, in their response, assert that they **cannot** agree with our assessment. This suggests a mind-set that is not open to considering a position other than their own. Whilst HE are the Government's advisor on the built heritage their written response in this case is simply the professional judgement of one person. This is illustrated by conflicting advice issued by HE in December 2018 in respect to the potential development of the site, which suggested to best avoid harm to heritage assets, the public open space should be provided within the eastern extent of the site, rather than the southern area¹.

We agree with the Inspector that the site falls within the setting of the Tortington Priory and Priory Barn. We disagree, however, as to the contribution that the site makes to the significance of these assets. We disagree that we have not sufficiently considered the importance of the agricultural landscape setting to these assets' significance. There is an historic relationship between the assets and the surrounding landscape but the strength of this relationship is not as strong as HE suggest. The Priory is no longer the centre of an agricultural estate. The land that was formerly part of that estate has changed considerably since the operation of the Priory and it would be incorrect to suggest that the current landscape, which includes significant 19th and 20th century features and infrastructure, makes anything more than a minor contribution to the assets' significance. There is no longer any functional or ownership relationship between the assets and the surrounding land, it is now purely an aesthetic contribution. We are strongly of the view that this aesthetic contribution can be maintained by the separation distance of the new development from assets and the landscaping proposed.

The vast majority of the significance of these two assets is contained within their evidential and archaeological value. By virtue of geography and separation, the proposal cannot harm the evidential and archaeological value of the assets themselves. Should HE or the Council consider it necessary, an appropriately worded condition can be attached to the outline planning permission requiring an archaeological watching brief or other exploratory works to be undertaken prior to the approval of reserved matters. This would ensure that any evidential value that is contained within the site can be examined and protected if necessary. It is important to note that this is an outline planning application, the layout of which is provided for illustrative purposes only.

It is my opinion that the Heritage Statement is an appropriate assessment of the impact of the proposed development on the historic environment. It is easy to claim that a report is not complete or robust, without providing a detailed explanation as to why. The Inspector in this case has not, in my opinion, correctly judged the overall significance of the assets and the relatively minor contribution that their wider settings make. Furthermore, she has failed to take into account that the site comprises only a small proportion of the surrounding wider landscape.

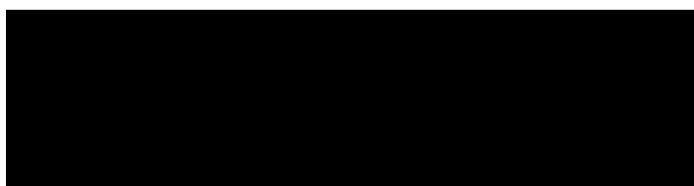
Finally, the Inspector has failed to advise you as to what level of harm the proposal will cause and the corresponding policy approach that should be taken to determine the application. Is the level of harm substantial or less than substantial, and therefore should paragraph 195 or 196 be applied. Without knowing this, you are unable to undertake the relative policy assessment. Which again,

¹ Historic England letter of 21 December 2018 to Arundel Town Council

suggests an inability in the response to clearly set out an understanding of how to identify the significance of heritage assets, the contribution made by their settings and the impact of development upon that identified significance.

I would be happy to discuss the HE response with you and join a call with the Inspector, if you feel that would be beneficial. Otherwise, I ask that you consider the application based upon our assessment of the assets and the impact of the proposal.

Yours sincerely



Jason Clemons MA MSc MRTPI IHBC
Director
Head of Heritage and Townscape