

Mr Michael Eastham
Arun District Council

Our ref: P01334150
29 March 2021

Dear Mr Eastham

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

**LAND AT FORD ROAD, ARUNDEL, WEST SUSSEX
Application No. AB/135/20/OUT**

Thank you for your letter of 24 March 2021 regarding further information on the above application for planning permission. In particular you requested further comment from us regarding an updated Heritage Statement and archaeological Desk-based Assessment (DBA). On the basis of this information, we offer the following advice to assist your authority in determining the application.

Revised Heritage Statement

The Heritage Statement has been updated with very minor alterations in relation to Tortington Priory scheduled monument and Grade II* listed Priory Barn. However, it does not address adequately several comments raised in our original letter, dated 18th January 2020. To help the applicant understand the detail required to support their assessment, I have described below how our previous comments should be addressed.

Visualisations

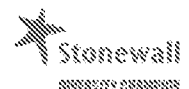
In our previous letter, we indicated that the assessment of setting-related impacts on the scheduled monument and listed building should be reconsidered in relation to visualisations produced from viewpoints agreed with Historic England. We are unaware of any such visualisations being produced.

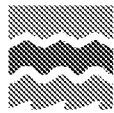
Effectiveness of planting as mitigation

We indicated that the applicant has overestimated the effectiveness of planting as mitigation, but this matter is not addressed in the revised Heritage Statement. The applicant should describe the extent to which the views to and from the designated assets would be screened, or filtered, at different times of year. The extent to which this planting would itself be harmful to the assets' significance by introducing a modern



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feature and blocking views should also be assessed. This assessment should be supported through production of appropriate visualisations.

Assessment of setting-related harm

We stated that the Heritage Statement had not sufficiently considered the importance of the agricultural landscape setting to the scheduled monument and listed building's significance.

One paragraph has been added to the description of the setting of the Priory complex, which describes the history of the surrounding landscape and states that the contemporary wider landscape makes a minor contribution to the significance of these designated assets, which is "largely derived from their immediate location and relationship with each other and the former monastic complex".

The Heritage Statement does not explain how this conclusion has been reached in terms of the Historic England guidance on setting that the applicant describes in their methodology. The applicant should demonstrate what 'attributes' of the setting contribute to the designated assets' significance, and whether they would be affected by the proposed development.

In addition, the applicant should demonstrate whether the setting's capacity to enable the significance of these assets to be appreciated would be diminished by the development. As these questions are left unanswered, the assessment of setting-related change remains unsupported.

Assessment of cumulative impacts

We advised that a cumulative impact assessment of the proposals in relation to other proposed and planned developments should be provided, and we are pleased that the applicant has addressed the A27 bypass in the revised Heritage Statement. The document describes the effects of the preferred route for that scheme and states that its effects would be greater than that of their proposals for Land at Ford Road.

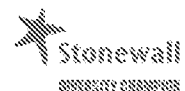
However, the applicant has not indicated whether the effects of their proposal would be altered by the presence of the A27 bypass. In this way, their assessment of cumulative effects is incomplete. To address the cumulative impact, the applicant should assess whether the loss of the scheduled monument and listed building's settings due to their proposed development is greater when the loss of setting to the south by the A27 bypass is also taken into consideration.

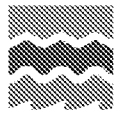
Masterplanning in response to heritage constraints

We stated in our previous letter that once the additional assessment has been carried



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out the Masterplan should be reconsidered to improve the outcome for the historic environment, including the settings of heritage assets. The Heritage Statement indicates that the Illustrative Masterplan has been revised.

We would be happy to comment on this revised Masterplan if you so wish. It would be useful for the applicant to confirm the ways in which the revised heritage assessment has been used to inform the revised Masterplan.

Likely effect of the proposed development on designated heritage assets

The revised Heritage Statement concludes that there would be no harm to Tortington Priory scheduled monument and Grade II* listed Priory Barn. Our position remains that the applicant has not provided adequate information to justify their assessment, as described above, and that we consider it likely that there would be harm to these designated assets.

Desk-Based Assessment

Potential for non-designated assets associated with Tortington Priory

Our previous advice noted the possibility that non-designated heritage assets associated with the scheduled monument and listed building may be present on the proposed development site, and that any such remains could be of equivalent significance to the monument and therefore subject to the same policies (NPPF para. 194; footnote 63).

The DBA notes the presence of ridge and furrow earthworks within the site. These may be associated with the scheduled monument, as part of its agricultural holdings, and their presence suggests that there may be other associated archaeological remains that are undetectable by the limited forms of assessment so far carried out by the applicant.

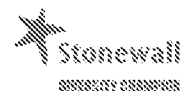
However, these earthworks are not of equivalent significance to the scheduled monument. Furthermore, the DBA has not found evidence for associated remains that are of a type that may be of equivalent significance, for example outlying rural or industrial structures. We are therefore satisfied that the question of whether the site contains nationally important remains has been addressed appropriately for this stage of the application.

Desk-based assessment of other non-designated assets

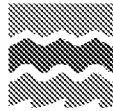
We also advised that the applicant should provide a DBA to assess the effects on non-designated heritage assets (NPPF para. 189). We advise you to consult your own archaeological advisor regarding the adequacy and effectiveness of the DBA in



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relation to non-designated heritage assets more generally.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

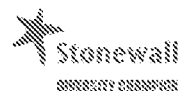
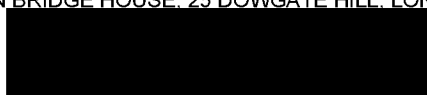
Yours sincerely

Paul Roberts

Team Leader - Development Advice



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