

Historic England

Mr Michael Eastham
Arun District Council

Our ref: P01334150

7 April 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.

Further to this, and our letters of the 18 January, 23rd March and 29th March, and our meeting on the 31st March, we offer the following advice to assist your authority in determining the application.

The application is for outline planning consent for the development of 90 dwellings and associated amenity at land at Ford Road, Arundel.

Historic England Advice

Significance

The proposed development site is adjacent to the Tortington Priory scheduled monument, which includes the Tortington Priory Barn grade II* listed building.

The Priory was founded in c. 1180 and was one of 225 such religious houses belonging to the order of St Augustine, which formed a major component of their local communities during the medieval period.

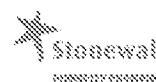
The Priory's setting makes a contribution to its significance. The Priory was the centre of an agricultural estate, in addition to its role as a spiritual enclosure, and was closely associated with the surrounding communities and settlements.



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The scheduled area constitutes only the centre of a wider monastic estate. Its setting within the agricultural landscape is therefore integral to understanding its significance.

Impact

In our previous advice letters, we identified several concerns: inadequate heritage assessment and visualisations; impact on designated heritage assets through development in their setting; the effectiveness of screening; cumulative impacts with the A27 Arundel Bypass; and impacts on non-designated heritage assets.

We are pleased that an addendum to the Heritage Statement and an amended illustrative masterplan have been produced in response to our advice. However, visualisations have not been created, and we have not been able to make a recent site visit because of covid restrictions. Therefore, our advice arises from a desk-based assessment of the information provided.

We advise that the effect of development in the setting of the Tortington Priory scheduled monument is likely to cause the scheduled monument some harm, which will be less than substantial in scale, in the terms of the National Planning Policy Framework.

The harm arises from the change in the attributes of the priory's setting (open, green, agricultural), which presently helps a visitor to appreciate contemporary surroundings, purpose and use of the priory as a spiritual enclosure and centre of an agricultural estate. Cumulative impacts of change in its setting from this development and the A27 Arundel Bypass would also contribute to the harm.

We acknowledge that the land on the south of the proposed site will form a buffer that has reduced the visual impact on Tortington Priory, from what was initially proposed. The very recent amendments to the illustrative masterplan to increase tree planting along the southern edge of proposed houses is likely to further ameliorate the impact.

We do not comment about non-designated heritage assets, as it is more appropriate for you to take your advice from the Council's own archaeological advisor.

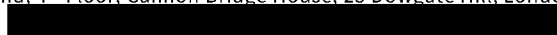
Policy

Under the National Planning Policy Framework (NPPF) it is a core planning principle to conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations (para.184).

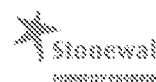
Local planning authorities should assess heritage significance in order to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal (para. 190).



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Any harm to the significance of a designated heritage asset should require clear and convincing justification (para.194).

For applications that would result in less-than-substantial harm to a heritage asset, the harm should be weighed against the public benefits of the proposal (para. 196).

Position

The proposed development is likely to cause the Tortington Priory scheduled monument some harm, which will be less than substantial in scale. However, we have been unable to precisely assess the potential for harm from our desk-based assessment of the documents available (NPPF 190).

We acknowledge that the applicant has taken some action to avoid conflict between aspects of the proposal and conservation of the heritage assets (NPPF 190).

While we are not certain that the harm has been avoided or minimised as far as possible (NPPF 190), we think it is capable of being reduced further through further amendment of the illustrative master plan.

We also consider that the likely harm is capable of being justified following further assessment of impacts on the setting of the priory, and amendment of the master plan if necessary (NPPF 194).

If you consider the harm likely to be outweighed by public benefits, and are minded to grant planning permission now (NPPF 196), we think that further harm reduction, if needed, could be delivered through amendment of the master plan at the Reserved Matters stage. We suggest that appearance, landscaping, layout and scale should be Reserved Matters.

Recommendation

Historic England does not object to the principle of development on heritage grounds.

The proposed development is likely to cause less than substantial harm to the Tortington priory scheduled monument but we think that further harm reduction could take place at the Reserved Matters stage if necessary, if you are minded to grant outline planning permission now.

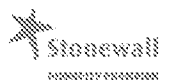
In determining this application, you should additionally bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have 'special regard' to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account in determining the



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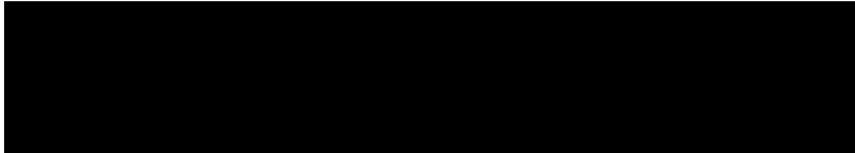
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application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

Yours sincerely

Paul Roberts

Team Leader - Development Advice



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