

[REDACTED]

From: Peter Tanner [REDACTED]
Sent: 25 September 2018 17:54
To: Anita Gardner
Cc: Simon McFarlane; Matt Turpin; Nick Watkins; Ziyad Thomas; Alex; Laurie Marlow
Subject: Re: AB/36/18/PL - Blastreat / Greenhurst, Fitzalan Road, Arundel

Anita

Further to my earlier email commenting on AHA's representations of 9 September 2018, have you received the affordable housing viability appraisal carried out on behalf of the Council by Dixon Searle and if so, could you please forward me a copy.

I also attach for your information my consultation response to the proposed draft policies of the Arundel Neighbourhood Plan 2 which I have submitted to Arundel Town Council for consideration. You might wish to copy this to your Planning Policy Team.

Regards

Peter Tanner

Planning Director

12 Headlands Business Park, Salisbury Road, Ringwood, Hampshire, BH24 3PB

[REDACTED]


www.renaissancegroup.co.uk



On Tue, 25 Sep 2018 at 17:29, Peter Tanner  wrote:

Dear Anita

My architect and I have now reviewed the planning submission drawings and other supporting material against the allegations made in the correspondence from AHA! dated 9th September 2018.

I set out below our point-by-point comment on their concerns. The numbers of the bullet-points correspond with their numbered concerns.

Rear Elevation South:

1. The fence shown on the southern boundary is a proposed new fence, as indicated in the boundary enclosure schedule shown on the submitted Site Plan drawing no. 1650-51A and as also shown on the submitted landscape drawing. The fence is shown from the angle from which the south elevation is viewed. This is not an error.
2. The stepping in levels is the result of where the elevation cut line is taken. This is not an error.
3. The driveway is obscured by the fence mentioned in point 1 and is therefore partially obscured. This is not an error. The position of the vehicular access can be clearly interpreted from the proposed Site Plan.
4. Elevation drawings, including neighbouring buildings, are shown conventionally in orthographic projection rather than in perspective view. If the LPA require eaves and ridge heights of nearby buildings to be topographically surveyed to enable a comparison with the height of the proposed development to be assessed, we can arrange for that additional information to be obtained. However, the submitted 'Verified Views' accurately show how the height and massing of the proposed building will relate to its surroundings.
5. Westbury Lodge is behind the elevation cut line in this elevation and so has not been shown in this view. However, the relationship of the proposed building to Westbury Lodge is clearly shown on submitted drawings 1650-58 and 1650-59B.

North Elevation:

6. It is not a requirement to show people on balconies on elevation drawings. This does not constitute an error or omission in the drawings. There is sufficient information contained in the submitted drawings for the distance of separation from balconies to neighbouring properties to be considered and for intervening screening from buildings, vegetation and boundary enclosures to be identified to enable a proper assessment of whether there is likely to be any harmful overlooking or loss of privacy.
7. The driveway is shown on the north elevation, on the Site Plan and on the Landscape Plan to enable this to be properly considered. There is no error.
8. The relationship of the proposal to neighbouring properties can be properly assessed from the Location/Block Plan and the Site Plan and various sections. If the Planning Officer requires any additional sections to assist in their appraisal of the proposals, these can be provided.

9. See response to 8 above.

North-East Elevation

10. Refer to the submitted landscape plan that provides details of planting, including trees. The landscape plan shows areas where there will be hedge/shrub planting together with locations for the planting of appropriate specimen fastigiate trees. The landscape plan has been prepared by qualified landscape architects in consultation with arboricultural experts, Barrell Treecare. The planting proposed has appropriate regard to area proposed for planting and the relationship to the building.

11. The north west wing of Westbury Lodge adjacent to the application site contains three floors of accommodation with the second floor contained within its steeply pitched roof which accounts for its height and massing as shown in this view. The relationship to the proposed development is correctly shown.

West Elevation:

[11.] It is not clear what the 'circular' part to the communal area refers to. It is assumed this refers to the curved 3-storey bay which is shown on the 'reveal' (drawing 1650-59B) but does not appear in the west elevation because it is obscured by other parts of the building in this particular view.

12. The relationship of the proposed building to Otters Quay can be properly assessed from the submitted Location/Block Plan and the Site Plan. This relationship is also shown on the submitted CGI view looking northwards along Fitzalan Road. This does not amount to an error or an omission.

13. This is shown correctly. The building is shown at such an angle that the sub station is obscured by the building. This is not an error. The staircase adjacent to the substation can be seen in the 'Reveal Elevation' (drawing 1650-59B).

14. Refer to 10 above.

15. Refer to 6 above.

16. Due to the angle of this view the carport is shown indicatively in this elevation drawing. The carport is shown in full in submitted drawing 1650-60. This does not amount to an error or omission.

17. The proposed carport barn is enclosed on its rear elevation adjacent to the end of the rear gardens of the Queens Lane properties. This, together with the very low traffic generation; the low frequency of vehicle movements; and the limited hours during which vehicle movements are likely to take place throughout the day associated with sheltered housing for the elderly (as referred to in the submitted Transport Statement) is such that there will be little or no disturbance to the proposed occupiers of the development or to the occupiers of the Queens Lane properties. Accordingly, under these circumstances there is no reasonable justification for a noise survey to be carried out.

The "Reveal" Elevation:

18. The nearest balcony is 6.2m from the fence of the parking court of Westbury Lodge and 7.9m to the rear corner of the neighbouring rear garden of the nearest Queen Lane property. Notwithstanding, the line of sight from the proposed balconies will be curtailed by the existing outbuildings to the rear of Westbury Lodge and by the proposed pitched roof carport barn. This, together with the distance of separation and oblique view from these balconies is such that there will be no harmful overlooking or loss of privacy. This can be clearly deduced from the submitted drawings.

19. The proposed development shown on Site Plan 1650-51A and the topographical site survey shown on drawing 1650-61 are both shown at 1:200 scale and can be readily compared one to the other.

20. The Ground Source Heat Pump building (notated GSHP on the drawing) is adjacent to the outbuilding within the grounds of Westbury Lodge. The 'Reveal' elevation shows the free

standing substation building between the proposed building and Westbury Lodge. This can be noted if required.

Ground Floor Plan:

21. It is conventional architectural practice to show floor plans in isolation to the site layout. The relationship of the ground floor is shown in context with the site layout on the Site Plan drawing 1650-51A. The Site Plan shows the relationship of ground floor apartments to their patios and surrounding garden areas, etc.

22. Flat 14's patio is shown on the Site Plan and on the Elevations. This is not an error.

Block Plan:

23. The site layout conforms to the topographical survey. The access driveway is 6 metres wide in line with the front elevation and narrows to 4 metres opposite the entrance to the buggy store before widening out to between 5.8 metres and 7.5 metres adjacent to parking spaces 1 to 4. This arrangement provides satisfactory width for two vehicles to safely pass each other along the driveway with adequate forward visibility along this access in both directions. The drawing is not in error.

24. A Road Safety Audit has been carried out at the request of the Highway Authority and this will be submitted together with a drawing showing sight line visibility at the access junction satisfying the guidance in Manual for Streets.

25. It is not usual architectural convention to show steps and terraces within the grounds as part of the building footprint on the Block Plan. This is not an error. The relationship of steps and raised terraces to the building are clearly shown on the Site Plan drawing 1650-51A.

26. A turning head for deliveries and ambulances is shown between parking spaces 11 and 12 as shown on the Site Plan and is further illustrated in the tracking diagrams to appendix C of the submitted Transport Statement. Refuse vehicles will service the site from the road. The majority of existing properties on Fitzalan Road are similarly serviced from the road. There is sufficient width of access for fire appliances to enter the site although in reality it is likely that in the event of a fire a fire appliance would park on Fitzalan Road, as would be the case for existing properties along Fitzalan Road.

27. These buildings are labelled on the site plan.

28. The car port is clearly indicated on the Site Plan. This can be shown on the Block Plan if requested by the LPA.

29. The Block Plan is at a different scale to the Topographical Survey drawing. The Site Plan and the Topographical Survey drawing are both to 1:200 scale.

30. There is a gable shown clearly on the Block Plan, Elevations, Site Plan and on the Roof Plan. This is not an error.

31. The layout has been designed to include adequate pedestrian visibility splays. These can be noted if requested by the LPA.

32. Refer to 26 above.

33. The parking spaces referred to by AHA form part of the highway outside of the site and are not demarcated parking bays. The proposed development does not encroach on that part of the highway. It is not usual to show non-demarcated parking spaces on the highway.

34. The dropped kerb is shown on the topographical survey drawing. The kerb-line to Fitzalan Road and the bell-mouth entrance to Otmers Quay are clearly shown on the Site Plan. It is not usual to show dropped kerbs to nearby properties on the planning drawings. There has been no omission.

Site Section:

35. With regard to Daylight and Sunlight for development control purposes, refer to the submitted BRE Report that accompanies the planning application. Right to Light is a separate civil law matter and is not a planning development control matter.

36. The assumption by AHA on this point is incorrect. The steps are 150mm tall and therefore the 8 steps are part of a 1.2m change in levels as shown.

37. Right to Light is a separate civil law matter and is not a matter for determination under planning development control.
38. The plotting of the neighbouring properties have been based on the OS Map. The small bay referred to at Riverside House is not shown on the OS Map. We have offered to carry out a measured survey of Riverside House and would be prepared to add the small bay window to the site section once surveyed. The owner of Riverside House is yet to agree when we can enter onto his property to undertake that measured survey.
39. Refer to 38 above.
40. BRE have carried out their appraisal of daylight and sunlight to neighbouring properties in accordance with BRE best practice guidance.
41. The window to room 4 of Riverside House referred to in the BRE Daylight and Sunlight Report is shown on drawings in the public domain as a non-habitable room (ensuite bathroom). Refer to BRE Daylight and Sunlight Report.
42. Refer to 37 above.
43. Refer to BRE Daylight and Sunlight Report.
44. Refer to BRE Daylight and Sunlight Report.
45. The planning application is accompanied by a surface water drainage strategy report.
46. The planning application is accompanied by a surface water drainage strategy report.

Topographical Survey:

47. The Site Plan conforms to the topographical survey.
48. The south west site boundary is straight, as per the topographical survey (we believe the AHA's comment refers to the neighbouring parcel of land shown on the topographical survey that is within the BT Depot site and which is at an angle to this boundary).
49. The topographical survey does show the dropped kerb to Riverside House. We have no reason to question its accuracy.

Indicative Street Scene:

50. The ridge height is consistent with the elevations. Ground levels vary, and therefore the ridge will appear different depending upon where the elevation/section is taken from. This is not an error.
51. We accept AHA's comment that the central ridge line of Otmers Quay is positioned slightly below the ridge line of its gables. However, this relationship is accurately and clearly shown in the submitted 'Verified Views'. Notwithstanding, this anomaly does not materially change the overall relationship of the proposed development to Otmers Quay and merely requires a minor amendment to the 'indicative street scene' drawing. We strongly refute AHA's allegation that this unintentional anomaly is a 'material error' or that it is 'grossly misleading'.
52. As referred to above we have offered the owner of Riverside House to carry out a measured survey of that property. This will enable us to review the accuracy of this indicative street scene in that respect.
53. Refer to 52 above.

Tree Protection areas/zones:

54. The two TPO trees referred to are located outside of the application site on the opposite side of Fitzalan Road. The physical presence of that adopted highway together with the utility services and public sewers running under that road will be a major constraint to the root system of those trees such that the distance of separation to the proposed development will not harmfully impact on the root system of those trees. Had that been the case our professionally qualified arboricultural consultants would have alerted us to the matter and would have included those trees on their arboricultural impact appraisal. We will be guided by our arboricultural consultant and the Council's Tree Officer on this matter.

55. Refer to 54 above.

Landscaping

56. Refer to 10 above.

Artists Impression:

57-68. The CGI artists impressions have been presented to show how the elevations have been articulated and how the development will generally sit within its surrounding. They are for 'illustrative purposes' only. It is for this reason that the application has also been accompanied by a 'Verified' View' Report showing how the proposed building will appear within its setting when viewed from the few public vantage points where the building will actually be visible. In the Design and Access Statement accompanying the planning application an appraisal of the various protected views of Arundel referred to in the Arun Local Plan was carried out. This found that there were very few of those protected views where the building could actually be seen. The 'Verified Views' have been selected to best show how the height and massing of the building would relate to its surrounding built context. Those determining the planning application will no doubt not simply rely on those verified views and the CGI's but will visit the site and its surrounding to carry out their own assessment.

It is evident from the above that AHA's allegation of there being 67 drafting errors in the submitted planning drawings is unfounded.

I would be grateful for the Planning Officer to consider the above response to their allegations. If, having carried out that exercise you consider you require any further information or clarification of the submitted drawings please do not hesitate to contact me.

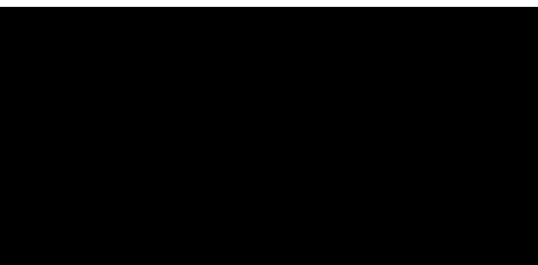
I shall send a copy of this email to the AHA group via Adrian Burrows.

Regards

Peter Tanner

Planning Director

12 Headlands Business Park, Salisbury Road, Ringwood, Hampshire, BH24 3PB



www.renaissancegroup.co.uk



On Thu, 20 Sep 2018 at 17:18, Peter Tanner [REDACTED] wrote:
Anita

I have received an email from Adrian Burrows on behalf of the AHA Group dated 18 September 2018 advising me that they have submitted further representations on the current planning application alleging various errors and omissions on the planning drawings accompanying the application.

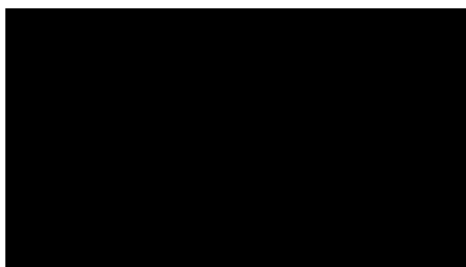
I write to advise you that we take these allegations very seriously and I have instructed our architect to examine each and every allegation thoroughly. Once our architect has completed that examination I shall contact you further to report on his findings.

Regards

Peter Tanner

Planning Director

▲ 12 Headlands Business Park, Salisbury Road, Ringwood, Hampshire, BH24 3PB



W www.renaissancegroup.co.uk



Renaissance Retirement Ltd is registered in England 03259684. Registered Office: Unit 12 Headlands Business Park, Ringwood, Hampshire, United Kingdom, BH24 3PB. More information about Renaissance Retirement Ltd, including a copy of our [Privacy Policy](#), which can also be found on our website [here](#).

Privileged / Confidential information may be contained in this message. If you are not the addressee indicated in this message (or responsible for delivery of the message to such person), you may not copy or deliver this message to anyone. In such case, you should destroy this message and kindly notify the sender by reply email. Opinions, conclusions and other information in this message that do not relate to the official business of my firm shall be understood as neither given nor endorsed by it.

Please consider the environment before printing this email.

RENAISSANCE RETIREMENT LIMITED

CONSULTATION RESPONSE TO ARUNDEL NEIGHBOURHOOD PLAN 2 – DRAFT POLICIES LIST JULY 2018

I set out below the consultation response on behalf of Renaissance Retirement Ltd in respect of the consultation draft policies list of the emerging Arundel Neighbourhood Plan 2 (ANP2).

1.0 General Comment Relating to ANP2 Task Group Topic Areas and their Assessment of the Evidence Documents

Housing Delivery – Density

- 1.1 We are concerned that in formulating the draft policies relating to housing the ANP2 Task Groups have not heeded planning policy guidance on sustainable development and housing delivery set out in the National Planning Policy Framework 2018 (NPPF 2018) but have sought to limit or cap housing density contrary to that planning guidance.

- 1.2 The NPPF 2018 requires that the preparation and review of all policies (including those policies in neighbourhood plans) should be,

“...underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.” (Paragraph 31, NPPF2018).

- 1.3 The Government's objective is to **“boost significantly the supply of housing”** as set out in paragraph 59 of the NPPF, 2018. To achieve this aim, whilst ensuring that planning policies and decisions support development that makes efficient use of land, paragraph 123 of the NPPF requires that,

*“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments **make optimal use of the potential of each site.**”* (emphasis, own)

- 1.4 In these circumstances, criterion (a) to paragraph 123 requires that,

*“...a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. **This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;...**”* (emphasis, own)

- 1.5 In recognition of the above national planning objectives, Policy SD SP1 and Policy D SP1 of the recently adopted Arun Local Plan 2018 encourages sustainable development that make efficient use of land.

- 1.6 In the ANP2 Task Group Topics ‘Background’ introduction bullet point 5 comments,

“There is no longer a specific requirement from Arun District Council Local Plan (ADC LP) for land allocations in Arundel but NPs in the District need to contribute to 1,250 total homes target to 2031 or ADC will allocate sites”

- 1.7 It should be noted that neighbourhood plans in the district should aim to provide **at least** 1,250 homes. The adopted Local Plan does not set a ‘total’ or a ‘ceiling limit’ target. To place a limit on the delivery of housing within ANP2 would be contrary to the guidance in NPPF 2018 and the adopted Arun Local Plan 2018. The emerging ANP2 policies and supporting documents should be worded so as to encourage the efficient and optimal delivery of housing at increased densities and should avoid placing a limit on housing numbers.

Housing for Older People

- 1.8 To ensure the delivery of a sufficient supply of homes NPPF 2018 requires that housing need should be informed by a local housing assessment which takes account of current and future demographic trends and market signals. Within this context the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies “... including, but not limited to, those who require affordable housing, families with children, **older people**, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes”. (Paragraph 61, NPPF 2018) (**Emphasis, own**).
- 1.9 The ANP2 Task Group Evidence Documents includes the “Updated Housing Needs Evidence (September 2016) prepared by GL Hearn on behalf of Arun District Council and the “Rural Community Profile for Arundel (Parish)” (July 2013) prepared by Action with Communities in Rural England (ACRE) Rural Evidence Project (Oxford Consultants for Social Inclusion [OCSI]). Both of those documents point to the very high elderly population profile for both the district and for Arundel. They also indicate a significant projected increase in the local elderly population over the plan period. In the light of the projected increase in the elderly population the GL Hearn study identifies a significant need for the delivery of specialist housing for older people.
- 1.10 The ANP2 Task Group Topics on ‘Housing’ identifies that very few new homes have been built in the Arundel area in the last decade. The Task Group Topic also comments that there is evidence of older households occupying large homes but there is little smaller stock to downsize to.
- 1.11 Despite these findings and the substantive demographic evidence of the need for housing for older people, the emerging neighbourhood plan not only remains silent on the pressing need for specialist housing for older people but has actually suggested that housing for older people should be excluded from the development of the site of Green Hurst and Blastreat, Fitzalan Road in terms of the housing allocation of this site in draft ANP2 Policy AR2 Site 13.
- 1.12 The demographic evidence clearly provides justification for the delivery of additional housing for older people. Site 13 is eminently suitable to accommodate a development of sheltered housing for the elderly being sustainably located on the edge of town centre within walking distance of town centre shops and services and with good access to public transport.

1.13 At the date of writing, there are only five sheltered housing apartments within two developments available for sale to the elderly within walking distance of the town centre of Arundel. These development are now somewhat dated and do not provide the standards and energy efficiency qualities of current new build sheltered housing. Furthermore, the ageing local population and the projected significant increase in the number and proportion of older people in Arundel over the plan period will require the delivery of a choice of new homes specially designed to serve their needs in old age.

1.14 It is considered that the emerging draft ANP2 has failed to take account of current and future demographic trends relating to the elderly population; has failed to recognise the need for the provision of new homes for older people; fails to recognise the social, health and economic benefit of providing housing for sale to the elderly; and fails to acknowledge the benefits that 'down-sizing' and the release of under-occupied family housing back onto the local market would deliver.

2.0 COMMENT ON THE ARUNDEL NEIGHBOURHOOD PLAN REVIEW: INITIAL SITE ASSESSMENTS REPORT (JULY 2018) – RELATING TO GREEN HURST AND BLASTREAT, FITZALAN ROAD (SITE 13)

2.1 The initial assessment report refers to the wording of the previously approved Policy 5, namely,

*"The Neighbourhood Plan will support proposals for housing development of **approximately** 24 dwellings at Fitzalan Road, comprising a mix of dwelling types, as shown on the Proposals Map' (**emphasis, own**)*

2.2 It should be noted that adopted Policy 5 did not preclude a single dwelling type but sought to 'encourage' a mix of dwelling types where a mix would be appropriate. Nor did adopted Policy 5 seek to exclude specialist housing for the elderly.

2.3 Furthermore, reference to 'about 24 dwellings' does not impose a 'cap' or 'upper limit' to the number of dwellings that could appropriately be accommodated on this site. This matter was specifically addressed during the Examination of the original Neighbourhood Plan.

2.4 In respect of the original Neighbourhood Plan, Policy 3 was modified by Examiner Christopher Collison, on his recommendation dated 10th February 2014 so that the Plan provided for the development **of a minimum** of 60 homes for completion in the period from 1 April 2014 to 31 December 2029 and not '**up to 90 homes**' as was proposed by the Town Council originally. The Examiner's rational for this was as follows:

*"At the heart of the Framework is a presumption in favour of sustainable development. All plans should be based upon and reflect this presumption. Neighbourhood plans should plan positively to support local development. The use of the term 'up to 90 homes', although described as a target, has the effect of establishing a maximum number. Strict adherence to a specified number creating a ceiling or cap on development represents an inappropriate constrained approach to sustainable development that may potentially be proposed during the plan period. (Page 20, Paragraph 4) (**Emphasis Own**)*

2.5 That approach to sustainable development and the need to make efficient use of land for housing at higher densities has been reiterated and reinforced by NPPF 2018.

- 2.6 Similarly, to ensure that the originally adopted Neighbourhood Plan accorded with the NPPF in promoting the delivery of more sustainable housing development the Examiner required Policy 5 relating to the land at Fitzalan Road (Site 13) to be modified to remove the limit on the number of dwellings proposed to be developed on this site. A modification was required to replace the Council's original wording of 'up to 24 dwellings' with 'approximately 24 dwellings'. The Examiner advised the following:

*"In considering policy 3 I have concluded the use of the term "up to" by imposing a ceiling or cap on total development does not have regard to national policy in which there is a presumption in favour of sustainable development. It is however understandable that those people preparing a neighbourhood plan will seek to estimate individual site capacities in order to appreciate whether or not provision will meet local need. **Actual numbers of homes achieved on sites will be determined on a site by site basis when detailed schemes are prepared and assessed taking into consideration site constraints.***

In order to have regard to national policy as set out in the Framework indicative capacities, instead of a cap, should be stated in respect of the River Road, Ford Road and Fitzalan Road sites..". (Page 21, Paragraph 4 & 5) (Emphasis own)

- 2.7 It was made explicitly clear during that Examination of the Neighbourhood Plan that the imposition of an upper limit on development was contrary to National Planning Policy Guidance. Similarly the quantum of development stipulated in Policy 5 was only ever intended to be indicative and the exact number of units could only be determined through the preparation and assessment of a detailed scheme.
- 2.8 It is considered that the above advice should similarly be reflected in the Site Assessment for all housing sites proposed by ANP2 and in the relevant proposed policies.

3.0 COMMENT ON PROPOSED DRAFT POLICY AR2 – SITE 13 – BLASTREAT/GREENHURST

- 3.1 In the Oneill Homer notes on behalf of the Neighbourhood Plan Project Steering Group to draft Policy AR2 – Site 13, it proposes that the site be allocated for housing,

"... for a housing scheme retaining part of former Swallow Brewery and confined to 60dph density (replacing Policy 5)"

- 3.2 I shall comment further below on the suggestion that part of the former Swallow Brewery be retained.
- 3.3 The comment that the proposed density should be 'confined' to 60dph flies in the face of the guidance set out in NPPF 2018, for the reasons set out above.
- 3.4 Accordingly, I would recommend that Policy AR2 – Site 13 be reworded as follows,

"Policy AR2 – Site 13 – Blastreat / Greenhurst

The Neighbourhood Plan will support proposals for housing development of a minimum of 24 dwellings. Having regard to the site being located within easy walking distance of the town centre encouragement will be given to a development of housing for older people or

alternatively for a development comprising a mix of dwelling types, as shown on the Proposals Map’

4.0 COMMENT ON THE SUGGESTION THAT DRAFT POLICY AR2 – SITE 13 – BLASTREAT/GREENHURST – SHOULD PROVIDE FOR THE RETENTION OF PART OF THE FORMER SWALLOW BREWERY BUILDING

- 4.1 In the Oneill Homer notes on behalf of the Neighbourhood Plan Project Steering Group to draft Policy AR2 – Site 13, it proposes that housing development on this site should retain part of the former Swallow Brewery.
- 4.2 In the ANP2 Initial Site Assessment Report it comments that when adopting the original Neighbourhood Plan, including Policy 5, it did not acknowledge the local heritage value of those parts of the site that formed the original Swallow Brewery “...as this information only came to light after the making of the Plan”.
- 4.3 We question what information is alleged to have come to light to warrant that part of the former Swallow Brewery building now being worthy of local heritage significance. There is no evidence to suggest that the ANP2 Steering Group or others have commissioned suitably qualified consultants to carry out an appropriate assessment of the heritage significance of the building against the criteria set out in Arun District Council’s ‘Buildings or Structures of Character’ SPD (September 2005). Nor does it appear that Arun District Council has carried out an appropriate assessment of the heritage significance of the building against that criteria.
- 4.4 Indeed, the only assessments that have been carried out of the heritage significance of the building is that undertaken by specialist heritage consultants White Young Green (WYG) on behalf of Renaissance Retirement Ltd to inform their proposed development of the site and by Historic England in response to a request by others to have the building included on the statutory list of buildings of historic and architectural importance.
- 4.5 The comprehensive assessment carried out by WYG dated March 2018 assessed the building at 14 Fitzalan Road against Criteria 1, 3, 4 and 5 of Arun District Council’s ‘Buildings or Structures of Character’ SPD (September 2005) and found that the existing building has only a limited level of significance when considered against that criteria, primarily stemming from its association with the lost Swallow Brewery, rather than physical architectural merit. As the existing buildings lack significance in their own right, this limited significance is considered insufficient to warrant the retention of the building. As such, the degree of harm brought about by their removal should be mitigated by an appropriate level of recording secured by condition and balanced against its low level of significance and the benefits of the scheme, in accordance with Paragraph 135 of the NPPF (2012)[now Paragraph 197, NPPF2018].
- 4.6 It should be noted that the NPPF advises that in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required, “...having regard to the scale of any harm or loss **and the significance of the heritage asset.**” (Emphasis, own)
- 4.7 In their assessment report dated 13 April 2017 Historic England found as follows,

*“...The Swallow Brewery has clear local historic interest, as a link to a once major industry and ties to a prominent local family. **However, the former brewery building which is the subject of this assessment is one of the last remnants of a once substantial industrial complex. Furthermore, subsequent alteration internally, including the loss of any fixtures and fittings related to its original use, mean that the historic interest does not outweigh the lack of architectural interest and the loss of context.**” (Emphasis, own)*

- 4.8 It is evident from the above that the building’s association with the former Swallow Brewery alone does not provide it with sufficient heritage significance to warrant it being retained within any redevelopment of the site.
- 4.9 A detailed inspection of the building reveals that it is in a very poor condition structurally and much of the outer fabric of the building together with the internal components require substantial repair and/or replacement. The high cost of this amount of repair, refurbishment and conversion (which would also require the existing ground floor to be raised by about 1.3 metres above existing ground level and the first floor to be replaced, to address climate change and the predicted 1 in 100 year risk of flooding) would render the retention of the existing building unviable.
- 4.10 In the light of the above it is considered that the suggestion in Policy AR2 – Site 13 that the existing building be retained has not been based on an appropriate heritage assessment of the building and lacks a proper consideration of the current condition of the building and the likely prohibitive cost of its retention.
- 4.11 Accordingly, Policy AR2 – Site 13 should not refer to retention of part of the former Swallow Brewery.

5.0 COMMENT ON DRAFT POLICY AR7 AND THE SUGGESTION TO ADD SWALLOW BREWERY BUILDINGS (SITE 13) TO SAVED POLICY 13

- 5.1 For the reasons as set out in Paragraphs 4.1 to 4.11 above, there are no reasonable grounds or justification for the remnant Swallow Brewery building on Site 13 to be proposed to be retained.

Peter Tanner

Planning Director
Renaissance Retirement Ltd

19 September 2018