

University of Chichester – Project Cornerstone

Heritage Statement Addendum

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Quality information

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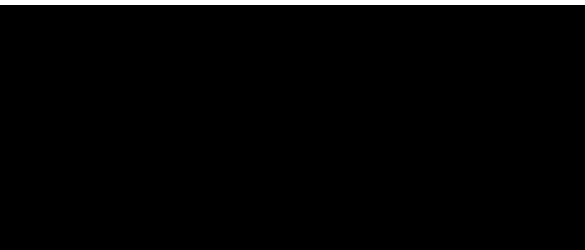
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1. Introduction

Background

- 1.1 An application (BR/54/16/PL) for the erection of 171 student accommodation bedrooms was made in February 2016 by the University of Chichester as part of an application for the construction of an Engineering & Digital Technology Park and a new access from Felpham Way. The application was subject to an objection from Bognor Town Council on design/heritage grounds regarding impact on the adjacent conservation area and a number of its listed buildings. The application was supported by a Heritage Statement (Forum Heritage Services 2016) and permission was granted in July 2016.
- 1.2 A revised application (BR/311/18/PL) was made in May 2018 for the erection of a 176 bedroom student accommodation building with associated hard and soft landscaping. The amendments included the addition of a secondary staircase as part of an emerging new fire strategy. The application was supported by the same Heritage Statement (Forum Heritage Services 2016) and the development was permitted on 26/02/2020.
- 1.3 Subsequent to permission being granted changes have been made to the scheme for which permission will be sought through a Minor Material Amendments (MMA) application under Section 73 of the Town and Country Planning Act 1990. As part of the application an addendum (this document) to the original heritage statement (Forum Heritage Services 2016) will be submitted.

2. The Consented Scheme and Proposed Development

Overview of the Consented Scheme

- 2.1 The revised consented scheme involves the construction of a new building providing accommodation for 176 students with associated hard and soft landscaping. The external appearance of the consented scheme closely followed the previously consented scheme which in turn referenced the new academic building at the Tech Park to the east of the Site. Dark brick was used at ground floor level to reference the academic building. At first floor and above the bedrooms are in lighter brick, referencing the colour of the wall of the Stage 1 part of the academic building. Other references to the academic building included panels of textured dark brick and gold anodised cladding including cladding forming a protruding frame around groups of windows. The scheme necessitated the demolition of part of the grade II listed Wall to South and East Surrounding Front Garden of No 71 (And Enclosing Nos 67 and 69 Within its Length) (grade II, NHLE 1027729) to 'facilitate through access into the newly developed part of the campus'.

Overview of the Proposed Development

- 2.2 The Proposed Development has the same height, massing and orientation as the consented scheme and covers much the same footprint. Where the scheme differ is the provision of the main staircase within the main building in the connection between the two wings. This obviates the need for staircases within protruding additions to the west, south, south-west and south-east elevations of the building, resulting in a more streamlined appearance. Other external features of the Proposed Development are:
- Removal of references to the Tech Park building including protruding frames, textured brick and gold cladding;
 - Reduction of cladding to create a largely brick building more in keeping with the materiality of the conservation area; and
 - Use of regular bay rhythms listed buildings to align the building more closely with the classically inspired listed buildings within the conservation area to the south-west of the Site.
- 2.3 The amended scheme does not include the demolition of part of the grade II listed Wall to South and East Surrounding Front Garden of No 71 (And Enclosing Nos 67 and 69 Within its Length) (grade II, NHLE 1027729) to allow for access.

3. Legislation, Policy and Guidance

3.1 Forum Heritage Services' Heritage Statement (2016) did not review legislation, policy and guidance as it applied to heritage at the time. The following legislation, policy and guidance applies at the time of writing of this Heritage Statement Addendum:

- Legislation
 - The Ancient Monuments and Archaeological Areas Act (1979)
 - The Planning (Listed Buildings and Conservation Areas) Act 1990
- National and Local Planning Policy
 - National Planning Policy Framework (2021)
 - Arun Local Plan 2011-2031
 - Bognor Regis Neighbourhood Plan 2015-2020
- Guidance
 - Planning Practice Guidance
 - Historic England Good Practice Advice Notes
 - GPA2 Managing Significance in Decision-taking (March 2015)
 - GPA3 The Setting of Heritage Assets (Second Edition, December 2017)
 - Advice Note 12: Statements of Heritage Significance (October 2019)
 - Principles of Cultural Heritage Impact Assessment in the UK (IEMA 2021)

Assessment Methodology

3.2 Forum Heritage Services did not set out their methodology within the Heritage Statement (2016) submitted as part of the original application. The heritage statement identified the designed built heritage assets present, described them and their settings and assessed their significance and the contribution made by their setting to that significance. While there has been additional guidance since the original Heritage Statement (Forum Heritage Services 2016) was compiled, the identification of information sources, methodology behind the baseline assessment and methodology and terminology used in the assessment of impact remain valid.

Baseline Conditions

3.3 Forum Heritage Services' Heritage Statement (2016) did not employ a study area around the Site boundary but identified designated heritage assets within close proximity to the Site and assessed the potential impact on them from the Proposed Development. Had a 500m study area been employed, an area considered suitable for the type of development proposed and the site conditions concerned, it would have identified 27 listed buildings. This Heritage Statement Addendum has reviewed these assets and concludes that the assets assessed by Forum Heritage Services, which are listed below, constitute those with the greatest potential for impact from the Proposed Scheme.

- Mordington (grade II, NHLE 1027722)
- The Dome (grade I, NHLE 1353844)
- St Michael's (grade II, NHLE 1353845)
- 55a Upper Bognor Road (grade II, NHLE 1027723)

- Wall to Road on South of No 55 (The Dome) (grade II, NHLE 1027724)
 - Walls of No 57, to North and South Along Road (grade II, NHLE 1027725)
 - 65 Upper Bognor Road (grade II, NHLE 1027726)
 - 67 and 69 Upper Bognor Road (grade II, NHLE 1027727)
 - 71 Upper Bognor Road (grade II, NHLE 1027728)
 - Wall to South and East Surrounding Front Garden of No 71 (And Enclosing Nos 67 and 69 Within its Length) (grade II, NHLE 1027729)
- 3.4 A search was undertaken of Historic England's National Heritage List for England on 11/03/2022 and no listings subsequent to February 2016 were identified in the area surrounding the Site. Arun District Council's website was consulted on 11/03/2022, no further conservation areas have been adopted within the study area since February 2016 and the boundary of the Hotham Park Conservation Area (also referred to as the Upper Bognor Road and Mead Lane Conservation Area on Arun District Council's website) has not been amended.
- 3.5 Forum Heritage Services' Heritage Statement (2016) did not identify non-designated built heritage assets in proximity to the Site. It did however identify a non-designated serpentine wall to the north of the listed No. 71 Upper Bognor Road. The Heritage Statement referred to this asset as 'statutory (sic.) listed by vesture of its physical connection to the Grade II listed wall.' This does not appear to be the case as it is the south and east sections of the wall that are listed making a case for the curtilage listing of the serpentine wall somewhat tenuous. The wall does however appear on historic Ordnance Survey maps of the late 19th century and is a non-designated heritage asset. Arun District Council's Buildings or Structures of Character SPD (2005) was referred to during the compilation of this Addendum and no locally listed buildings were identified in proximity to the Site.
- 3.6 Baseline conditions therefore remain the same as when the original heritage statement was written.

Assessment of Impact

- 3.7 The Forum Heritage Services' Heritage Statement (2016) assessed impact on the assets identified. The heritage statement found that impact on 65 Upper Bognor Road (grade II, NHLE 1027726); 67 and 69 Upper Bognor Road (grade II, NHLE 1027727); 71 Upper Bognor Road (grade II, NHLE 1027728) would be mainly from the presence of the Tech Park and would represent less than substantial harm. Regarding the proposed student accommodation, the heritage statement found that it would have a negligible impact on the grade I listed The Dome, the grade II listed buildings flanking it and the part of the Hotham Conservation Area in which they stand.
- 3.8 The amendments to the scheme in terms of form and materiality will decrease impact on the identified heritage assets resulting in lower levels of less than substantial harm.
- 3.9 It should be noted that the heritage statement did not include a search of the West Sussex Historic Environment Record (HER) relying instead on desk-based research, a site walkover and cartographic evidence. The heritage statement noted that there would be the potential for archaeology across the site and that proposed excavation for foundations or service trenches should be accompanied by a written specification for recording to be approved by the Local Planning Authority.
- 3.10 Given the lack of archaeological evidence put forward in the original heritage statement it is recommended that a search of the West Sussex HER is undertaken prior to any further application. Should the results of the search bear out the findings of

the original heritage statement a programme of evaluation works should be drawn up after consultation carried out with County Archaeologist for West Sussex.

Summary and Conclusions

- 3.11 This Heritage Statement Addendum has found that the cultural heritage baseline is unchanged since the original Heritage Statement was submitted in 2016. It is considered that the minor changes to the Proposed Development will not be responsible for increased impact on the built heritage assets identified but rather any degrees of less than substantial harm would be lowered as a result.
- 3.12 The demolition of part of the grade II listed Wall to South and East Surrounding Front Garden of No 71 (And Enclosing Nos 67 and 69 Within its Length) (grade II, NHLE 1027729) is not a part of the revised scheme which will not result in the loss of any historic fabric. The revised scheme, therefore, is more sympathetic to the historic built environment than the consented scheme.
- 3.13 There is the potential for archaeology throughout the Site. It is recommended that a search of the West Sussex HER is undertaken prior to any further application. Should the results of the search bear out the findings of the original heritage statement a programme of evaluation works should be drawn up after consultation carried out with County Archaeologist for West Sussex.

4. References

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