Representation on Planning Application Y/78/20/RES: Drove Lane East Proposals

"The Friends of the Old Ford to Hunston Canal" is a local voluntary group with the objectives of preserving the remains of the Canal, maintaining access to footpaths and restored remains, and recording the Canal's history. Our conservation work is in line with local planning policies that support conservation of the historic environment (Arun District Plan SP1), the Portsmouth & Arundel Canal (ADP HER DM5), and Yapton Neighbourhood Development Plan policies E8 and E10.

We have 3 disappointments with this proposal: (1) the lack of support for a key sustainable transport option – notably re-purposing the Canal route to help establish a Greenway for non-motorised users, (2) the quality of the Heritage Compliance Statement (HCS) and its unhelpful judgements around the opportunities to enhance and conserve heritage assets, and (3) the omission of any reference to the remains and history of Drove Lane Bridge.

On the first point, we endorse the comments made in other representations on the opportunities for sustainable transport by local groups working on behalf of cyclists and horse riders. We note that there is some provision for cycleways and paths, but we urge greater ambition and wider inclusivity.

Secondly, on the HCS, we are surprised at its lack of alignment with the National Planning Policy Framework (NPPF 2019), and linked guidance. We are disappointed that the proposers spend time criticising history (viz "*an incredibly poorly preserved stretch of the former canal*"), rather than proposing improvements that would significantly enhance and conserve non-designated heritage assets. Given that the applicants now have plans for the former canal within the Conservation Area, it might be expected that the "*incredibly poor*" preservation of this stretch be regarded as a challenge and a responsibility that they themselves should take up through this development opportunity.

Such improvements could include restoring and conserving a short section of the Canal, enhancing the right of way between Tack Lee Bridge and Drove Lane Bridge to make it available to other users, and promoting the history of the Canal through the placing of feature information boards and relevant artefacts from the Canal period.

On the third point, the remains of Drove Lane Bridge, built c. 1820, the HCS repeats the omissions in previous reports (CGMS 2018, 2017, TVAS 2017) where no mention is made of the significant bridge remains. Local groups can reference photographs, history of the by-passing of the bridge, and its subsequent dismantling leaving substantial brickwork behind. Fortunately, the pending archaeological evaluation of the site may offer more information on this heritage asset.

The NPPF defines "..*the value of a heritage asset to this and future generations (is) because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting*". The Friends argue strongly that the many

heritage aspects of the line of the Portsmouth & Arundel Canal and the Drove Lane Bridge site are largely ignored in the Drove Lane East proposals.

Our judgement is that the proposals as submitted are currently neither in line with the local policies promoting and protecting the line, features and structures of the Portsmouth & Arundel Canal, nor consistent with national guidance in the NPPF and the purposes of the designation of Conservation Areas, and fail to use a substantial new development of 300 houses to make a positive contribution to constructive enhancement of the Canal's character and distinctiveness. The Canal Group would be willing to work in tandem with the local community, other interest groups, the local council and planning authority, and the applicants, to secure a better scheme in these respects.

Friends of the Old Ford to Hunston Canal

22nd September, 2020