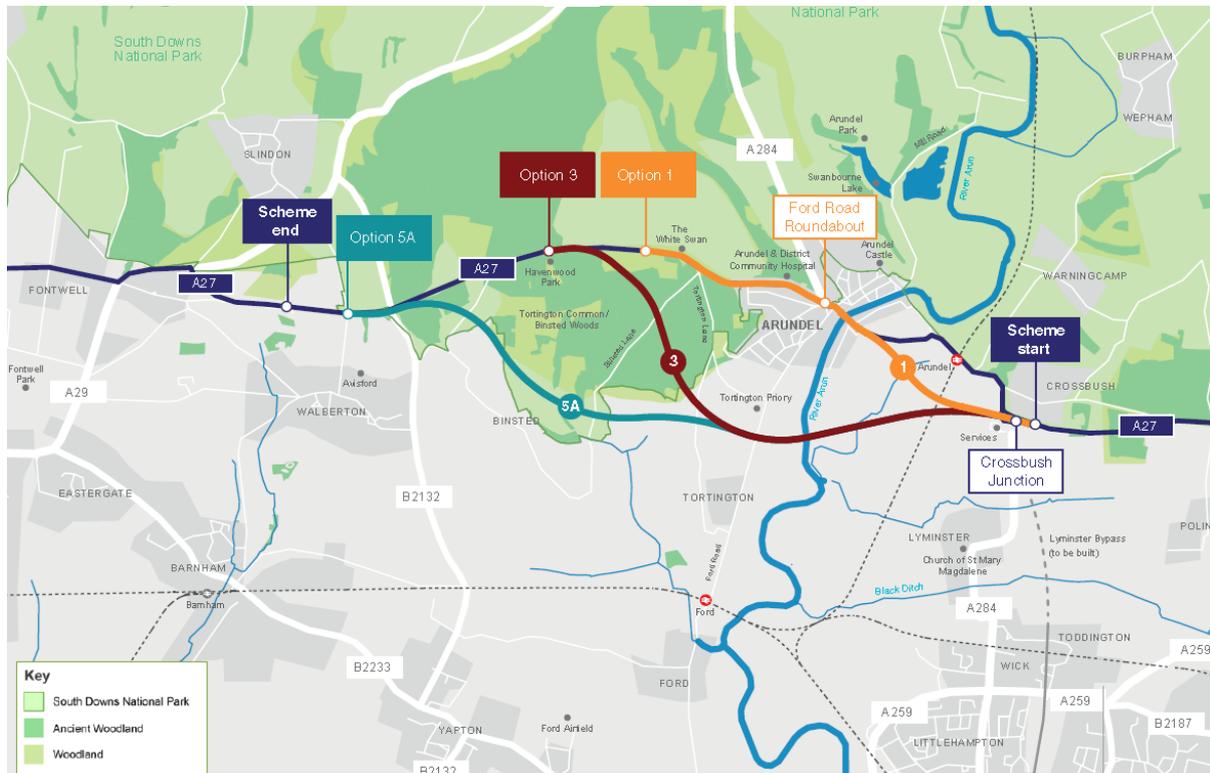


A27 Consultation – Arundel By-Pass Conservation Comments

1.1 There are currently three potential routes proposed for the Arundel by-pass, Routes 1, 3 and 5A.



1.2 None of the proposed routes affects the physical fabric of the castle nor crosses the boundary of any heritage designation covering it. Any heritage impact will, therefore, be upon the setting of the castle.

1.3 Historic England has published advice on the issue of setting (Historic England, *The Setting of Heritage Assets*, Historic Environment Good Practice Advice in Planning: 3). This document sets out a five step approach to considering the issue of setting and these comments follow this structure.

2. Step One: Identifying the heritage assets affected and their setting

2.1 The boundary of the National Park is complex in the vicinity of Arundel, with much of the town excluded but the Norfolk Estate, which includes the castle, being within. For the purpose of this exercise, therefore, comments are restricted to the setting of the castle.

2.2 The Castle itself is a Scheduled Monument and a Grade I listed building. It also forms part of a Grade II* Registered Park and Garden and a Conservation Area. In addition to the significant medieval fabric, the castle is also an example of a 19th century country house in the ‘castellated’ style.

2.3 The NPPF defines the setting of a heritage asset as: *The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a*

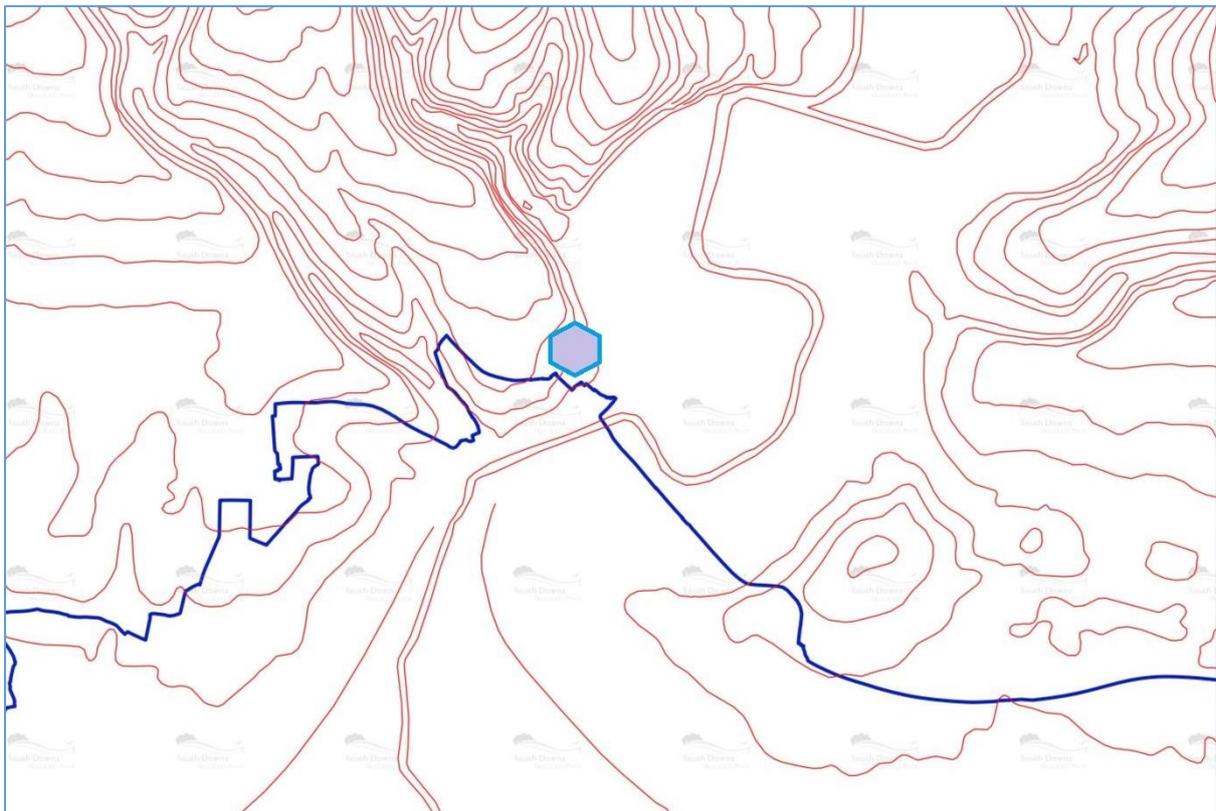
setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

2.4 The obvious and most important sense in this context is vision but sounds, smells, activities etc. can all have an impact on how a heritage asset is experienced and, therefore, its setting. Given these comments, it will be clear that it isn't always possible to map the extent of a setting. However, in this instance, the viewpoint analysis from the castle would be a good start.

2.5 To understand the setting of the castle, it is important to consider what exactly the castle represents and why it is located where it is.

2.6 Castles in general are the product of the feudal system introduced into England following the Norman Conquest. They combine the functions of a fortified dwelling for a member of an elite and a base for mounted troops to dominate the surrounding countryside and population. As such they were a vital component in allowing a relatively small and alien elite to control a much larger indigenous population. In some cases they also played a more strategic role.

2.7 Reflecting their role, castles were usually the largest and most prominent element in their landscape, which they were intended to overawe, control and dominate. They are rarely tucked away in inconspicuous places. The only other building type which matches castles in such landscape scale impact would be the great cathedrals. Together, they represent the twin pillars of temporal and spiritual authority in the medieval world.



The topographical context of Arundel Castle, with contours shown in red, and the National Park boundary in blue. The position of the castle is marked by the hexagon.

2.8 Arundel is a classic example of a castle in its landscape. It sits on a ridge or bluff of the Downs which juts out into the valley as it emerges from the Downs and starts to widen across the coastal plain. This position allowed it to control and dominate the valley of the Arun, both upstream and downstream to the coast. The Arun valley is itself an important strategic route through the Downs linking London to the south coast. In this regard there are a number of other castles which play a similar role in the other river valleys that bisect the Downs.

2.9 In this position, the castle to this day still dominates the landscape in the way in which it has since the middle ages. It is now accompanied by a great cathedral which, although built in a medieval gothic architectural style, is actually a 19th century building.

2.10 There are important views looking towards the castle from the south, principally from Ford Road, and from the castle looking out over the wider landscape.

2.11 The views from Ford Road are intermittent and depend on the height of the trees and hedges lining the east side of the road. This is a situation which can be easily altered by trimming of hedges, removal of trees etc. As it stands at present, there are already a number of points where there is a clear view of the castle from the road, which is a historic route across the valley. The importance of these views is enhanced by the way in which the castle is silhouetted against the sky and that they provide the best views of the surviving medieval parts of the castle, including shell keep, mural towers, and gatehouse. (Page 7).

2.11 From the castle itself, the town falls away to the river and views open up over the roofs of the town to the wetlands of the flat-bottomed valley, the river and the coast on the horizon. In many ways this is quite a timeless view with little modern intrusion. Even the current road is fairly well screened in views out from the castle. The scene now would not be particularly unfamiliar nor appear strange to a medieval resident of the castle. (Page 8)

2.12 Conversion of the castle into a country house in the 19th century left much medieval fabric intact, incorporated other earlier fabric into the new buildings, and was undertaken in the “castellated” style. As such these developments served to reinforce the role of the site in the wider landscape rather than dilute it. The view of the castle from below Crossbush is truly impressive even though much of what can be seen from this location is 19th century.

3. Step Two: Assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s).

3.1 Given the description above of the role of castles, their position and role within the wider landscape, and in this case the relatively little change in that wider context, it may be concluded that the landscape setting of Arundel Castle makes a significant contribution to our appreciation and understanding of the function, role and importance of castles in the middle ages and later, both in general and in particular for this site.

3.2 The Historic England guidance does provide a non-exhaustive checklist of potential attributes of a setting that may help to elucidate its contribution to significance which in turn, it divides into (i) the asset’s physical surroundings and (ii) the experience of the asset. They are not all listed here but a number will apply to the Castle.

4. Step Three: Assessing the effect of the proposed development on the significance of the asset.

4.1 In this context, the Historic England guidance suggest that the assessment should address the key attributes in terms of its location and siting; form and appearance; additional effects; and permanence. For this purpose, routes 3 and 5a are effectively the same whereas the impact of Route 1 may be slightly different.

4.2 **Location and Siting:** It has been established that the castle is a very dominant element in the landscape and that that landscape is relatively unaltered by modern intrusions. In all cases, the new road will cross the valley to the south of the castle. Route 1 is the nearest to the castle whilst Route 3/5a are further to the south. For all potential routes, the elevated roadway will cut across the southerly views out from the shell keep of the castle (Page 8). As such it will represent a strong modern visual insertion into that view which until now has been little altered. This will arise in particular because of the elevated nature of the road as it crosses the valley and the active nature of the new landscape component i.e. there will be lots of cars crossing it and the movement will really draw the eye. This contrasts with the largely rural, and “still” landscape which exists at present.

4.3 **Form and Appearance:** the elevated nature of the road, and its width, scale and ‘sweep’ across the landscape will emphasise its impact.

4.4 **Additional Effects.** The kinetic nature of the impact has already been mentioned and there must also be a potential impact arising from noise and perhaps fumes, particularly for route 1, until petrol and diesel engines have been completely replaced by electric vehicles

4.5 **Permanence:** once built, it seems unlikely that the road will be removed in the future so must be regarded as permanent.

4.6 In terms of harm to heritage assets and their settings, the NPPF distinguishes between “substantial” and “less than substantial harm”. It is a matter for the decision maker to determine which category the harm arising from a proposal falls into. The technical guidance that accompanies the NPPF has the following to say on this matter:

How to assess if there is substantial harm?

What matters in assessing if a proposal causes substantial harm is the impact on the [significance](#) of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting.

Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.

Policy on substantial harm to designated heritage assets is set out in [paragraphs 132 and 133](#) to the National Planning Policy Framework.

4.7 As the National Park Authority is not the decision maker in this case, it does not fall to it to make this judgement. Where it to be so, issues that may be considered would be the significance of the heritage asset, the role of its setting in defining that significance, and the scale of the impact of the proposed development on that significance.

4.8 The significance of the heritage asset is clear – it is protected by many heritage designations and at a high level. The contribution of its setting to that significance has already been explored and is also high. The road is a physically large and, with vehicles moving across it, a kinetic alien insertion into the setting. Given these comments, it is difficult to avoid the conclusion that the introduction of the road into the setting of the castle would represent substantial harm. Whilst the exact nature of the harm may differ slightly between the two route options, this conclusion relates to both.

5. Step Four: Explore the Ways to maximise enhancement and avoid or minimise harm

5.1 Short of putting the road into a tunnel, it is difficult to suggest any way to avoid or minimise the harm to the setting of the castle. It is probable that any attempt to screen the road with planting would end up introducing something which is just as alien to the landscape.

5.2 It might be argued that the creation of something which itself has positive merit – bridges and viaducts can be both impressive and attractive structures – would mitigate or minimise the harm. However, even in this form the new road would be alien and harmful to the setting of the castle and its significance.

6. Step Five. Make and document the decision and monitor outcomes

6.1 Not applicable at this stage.

7. Conclusion

7.1 To summarise:

- The castle is a major component in the historic environment and is protected by a range of statutory and non-statutory designations.
- Since its creation the castle has been the single most dominant human intervention into the landscape in its landscape.
- The landscape is otherwise relatively unaltered since the middle ages.
- The castle has great significance as an good example of a building type – medieval castle and 19th century country house in the “castellated” style. This is not affected by the proposed road.
- The visual dominance of the landscape by the castle is the product of its *raison d’etre* and allows a greater understanding and appreciation of the heritage asset. This is its setting.
- The creation of the new road will introduce a large, modern and kinetic component into a landscape that is largely medieval or early post-medieval in character, with a stillness and undeveloped nature, and as such will have a negative impact on that setting.

- Given the significance of the heritage asset, the contribution of its setting to that significance, and the scale and form of the proposed addition, the harm must be considered to be substantial.



