

# **ARUNDEL NEIGHBOURHOOD PLAN REVIEW 2018 – 2031**

## **SITE ASSESSMENT REPORT**

**JUNE 2019**

## **CONTENTS**

1. INTRODUCTION & BACKGROUND

2. SITE ASSESSMENT PROCESS

3. THE SITE ASSESSMENTS

4. SUMMARY

APPENDIX A: LAND AT FORD ROAD TECHNICAL EVIDENCE BASE SUMMARY

APPENDIX B: BLASTREAT/GREENHURST – SWALLOW BREWERY HERITAGE  
ASSESSMENT

APPENDIX C: FLOOD ZONES IN ARUNDEL

## 1. Introduction

This report has been prepared as part of the Arundel Neighbourhood Plan Review that has been completed by Arundel Town Council. The Town Council has undertaken a partial review of the made Neighbourhood Plan of 2014 in the light of the adoption of the Arun Local Plan in 2018.

The lead local planning authority, Arun District Council, has provided the Town Council with an 'indicative housing figure' (as per NPPF §66) of 50 dwellings in the plan period to 2031 over and above the housing completions, commitments and made Neighbourhood Plan allocations. The figure will be consulted on by the District Council as part of its own Non-Strategic Sites Development Plan Document, but it is considered to be a robust figure to inform the review.

Part of the Parish, and notably the northern edge of the town, also lies within the South Downs National Park. The National Park Authority has not been requested to provide such a figure, as it is clear from its emerging Local Plan that there is no requirement or expectation of housing growth on its edge of Arundel.

The Town Council formed a Steering Group to oversee this work on its behalf. In March 2018, the Steering Group reviewed the latest housing land availability data of the District Council. It then invited the Norfolk Estate and Angmering Park Estate, as the only owners of land within and adjoining the existing Built Up Area Boundary (BUAB) of the town (in Arun District and in the South Downs National Park), to outline their aspirations for making land available for future development. Renaissance Homes and Arun District Council were also invited to submit their aspirations for sites in their ownership within the BUAB.

The information received in response has informed the work of the Steering Group and its Task Teams in considering new site allocation prospects. It has essentially updated the Housing & Economic Land Availability Assessment (HELAA) of November 2018 in the Arun DC area and the HELAA of 2016 for the South Downs National Park Authority area. During the process of investigating the information and reviewing the Plan, the task groups identified other potential land to consider. In all, 19 sites have been assessed with a view to giving them further consideration in the project.

For those sites selected for proposed allocation, this assessment has been informed by the separate Sustainability Appraisal (incorporating a Strategic Environmental Assessment) (SA/SEA) and by evidence prepared to inform the Habitats Regulations Assessment. It and has benefited from technical evidence requested from landowners.

## 2. Site Assessment Process

The process began by with a review of 15 sites in the Parish contained in the Arun DC Housing & Economic Land Availability Assessment (HELAA) of 2017 and in the South Downs National Park Authority Strategic Housing Land Availability Assessment (SHLAA) of 2016. Another site – Crown Yard – was identified in the LUC Streetscape Report as having potential for a mixed residential and town centre use scheme and the Police Station on The Causeway was submitted by Sussex Police to the Town Council for assessment. Finally, two others – Land at Cemetery, London Road and Land Rear of Primary School, London Road – have been added to this final report, having been included in the HELAA, but excluded from the original list in error.

The sites are:

1. Horses Field, Torton Hill Road
2. Land Rear of Anne Howard Gardens
3. Arundel Riding Stables
4. The Causeway
5. Mill Farm Barn
6. Queens Lane
7. Land adjacent Fitzalan Road Allotments
8. Land off Fitzalan Road
9. Land off A27 Roundabout
10. Garage, Ford Road
11. Land West of Ford Road
12. Castle Stables, Arundel Castle
13. Blastreat/Greenhurst, Fitzalan Road
14. Former Gas Works, Ford Road
15. Industrial Units on Fitzalan Road
16. Crown Yard
17. Police Station, The Causeway
18. Land at Cemetery, London Road
19. Land Rear of Primary School, London Road

For the Steering Group meeting in July 2018, an assessment of the sites was undertaken to recommend which of these sites should go forward for further consideration for housing allocations in the Plan and which sites should be excluded. The full details of each site assessment are provided in Section 3 of this report.

The exclusionary criteria are:

- i. Land is too small to consider as an allocation (< 6 dwellings) but may be considered as windfall if inside the BUAB
- ii. Land is unavailable in the plan period
- iii. Land is subject to an absolute policy designation preventing development, i.e. designated Local Green Space (as per NPPF §100)

Although there are many other policy designations that discourage or constrain development (e.g. BUAB, flood risk, heritage), they are not considered exclusionary at this stage, as all the land in and around the town is subject to one or more of these constraints.

After applying the exclusionary criteria and by also excluding those sites already allocated by the made Neighbourhood Plan (and where no review was considered necessary), the remaining sites were the subject of an informal consultation exercise with the local community and landowners in summer 2018 to ascertain preferences, given that not all of the sites would be required to meet the 'indicative housing figure'.

Following that consultation, the Steering Group recommended to the Town Council that the Pre-Submission Review should propose to allocate three sites during its consultation period in November 2018 – January 2019:

- 11. Land West of Ford Road
- 13. Blastreat/Greenhurst, Fitzalan Road
- 17. Police Station, The Causeway

Having considered all the representations made on the Pre-Submission Plan Review, the Steering Group recommended to the Town Council that all three sites should remain in the Submission Plan, subject to some policy modifications.

### **3. The Site Assessments**

Set out in the section are the individual site assessments. In each case, the assessment considers the suitability, availability and achievability for housing development on the site, with a summary assessment. Where relevant, the extract from the 2018 HELAA or 2106 SHLAA is provided for completeness.

## Site 1 – Horse Field, Torton Hill Road

**ADC HELAA:** Site 59

### **Suitability:**

Lies outside Built Up Area Boundary (BUAB) and adjoins SDNPA and ancient woodland.

Policy 11 of the made Arundel Neighbourhood Plan designates all the land as a Local Green Space (LGS).

### **Availability:**

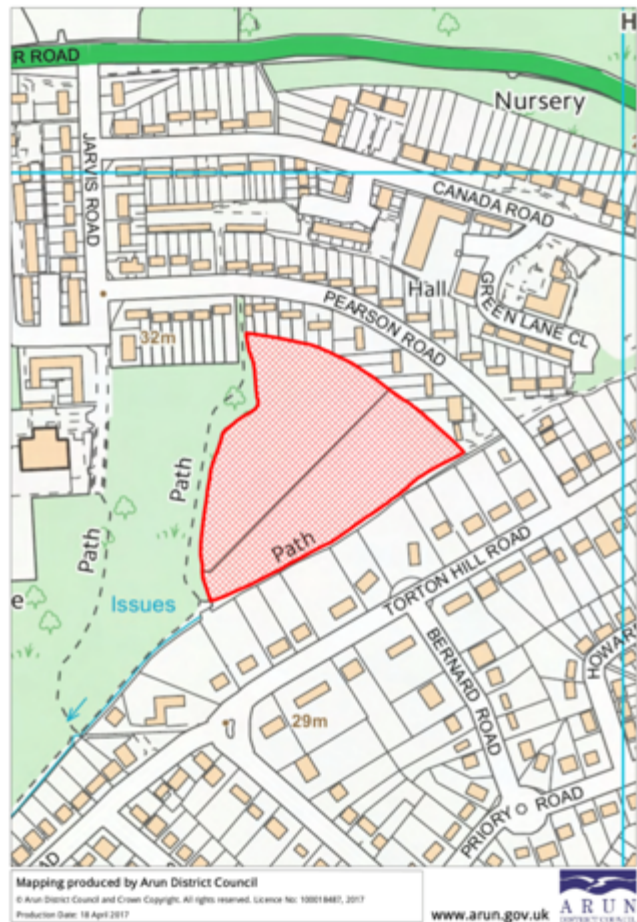
Available for housing (Angmering Park Estate).

### **Achievability:**

No data to indicate not viable although access difficult and site slopes steeply.

### **Summary Assessment:**

The LGS policy designation is an exclusionary criterion and so this site is not considered further.



## Site 2 – Land Rear of Anne Howard Gardens

### ADC HELAA:

Not identified in the HELAA but adjacent to Site AB4 Land south west of St Philip Catholic Primary School.

### Suitability:

Adjoins the National Park.  
Lies within the Arundel Conservation Area.  
Lies outside BUAB.

### Availability:

Available (Angmering Park Estate).

### Achievability:

No data to indicate not viable.

### Summary Assessment:

The land is too small for allocation and so is not considered further.





## Site 3 – Arundel Riding Stables

**SDNPA SHLAA:** Site AR001.

### Suitability:

Lies within the National Park.

Lies within the Arundel Conservation Area.

Lies outside BUAB.

### Availability:

Existing use potentially coming to an end within the next 10 years. Possibly suitable for housing or retail when available but uncertain in plan period (Angmering Park Estate but leased).

### Achievability:

No data to indicate not viable.

### Summary Assessment:

There is still considerable doubt that the land will be made available in the plan period and so it is not considered further.



Site Ref	Site Address	Settlement	Parish	Recommendation	Total Yield	0-5 Years	6-10 Years	11-15 Years	Rejected/Excluded Reason
Settlement: Arundel									
AR001	Riding Stables, Park Place	Arundel	Arundel	Rejected	0	0	0	0	Development on the site would have a potential adverse impact on the character and appearance of the landscape.

## Site 4 – The Causeway

**SDNPA SHLAA:** Site AR003.

### Suitability:

Lies within the National Park.

Lies outside BUAB.

Lies within Local Wildlife Site designation (good quality semi-improved grassland).

Lies within Flood Zone 3 (but defended), an area with a high probability of

flooding. Majority of the site available for car parking, terms to be negotiated. North eastern half = extended Lido car parking. South half of the south western section = car parking associated with the Mill Farm Barn as a Children's Nursery, as per the supporting text to Policy 9 of the made Plan (Mill House Farm), which identified the land as offering the potential for a private car park to serve the new nursery proposal. This has not yet been implemented but the owner indicates that there is still interest (Angmering Park Estate).



### Availability:

Available (Angmering Park Estate).

### Achievability:

No data to indicate not viable.

### Summary Assessment:

The site is unlikely to pass the flood risk sequential test (as there is sufficient suitable land available for allocation that is not in a flood risk area), but, in any event, there is no information to suggest that Policy 9 of the made Plan will not be implemented during the plan period and so is not considered further.

Site Ref	Site Address	Settlement	Parish	Recommendation	Total Yield	0-5 Years	6-10 Years	11-15 Years	Rejected/Excluded Reason
AR003	Land at the Causeway	Arundel	Arundel	Excluded	0	0	0	0	The site is located wholly or largely within a Local Wildlife Site.

## Site 5 – Mill Farm Barn

**SDNPA SHLAA:** N/A

### **Suitability:**

Lies outside BUAB.

Lies within Local Wildlife Site designation - good quality semi-improved grassland.

Lies within Flood Zone 3 (but defended), an area with a high probability of flooding.



### **Availability:**

Proposals for a nursery are thought to be imminent on this site (Angmering Park Estate).

Policy 9 of the Plan sets out criteria for development at this site and so accepts the principal of the re-use of the building.

### **Achievability:**

No data to indicate not viable.

### **Summary Assessment:**

The site is unlikely to pass the flood risk sequential test (as there is sufficient suitable land available for allocation that is not in a flood risk area), but, in any event, there is no information to suggest that Policy 9 of the made Plan will not be implemented during the plan period and so is not considered further.

## Site 6 – Queens Lane

**ADC HELAA:** N/A (but adjacent to Site AB9 Telephone Exchange, Fitzalan Road).

### **Suitability:**

Lies outside BUAB.

Lies within Setting to Arundel policy designation.

Lies within Flood Zone 3, an area with a high probability of flooding.



### **Availability:**

A planning application for two dwellings on this site is imminent (Angmering Park Estate).

### **Achievability:**

No data to indicate not viable.

### **Summary Assessment:**

The land is too small for allocation and so should not be considered further.

## Site 7 – Land adjacent Fitzalan Road Allotments

### ADC HELAA:

Forms part of the larger Site 56 Mill House Farm

### Suitability:

Lies outside BUAB.

Lies within a Biodiversity Opportunity Area.

Lies within Flood Zone 3 (defended), an area with a high probability of flooding.

Lies within Setting to Arundel policy designation.

Original idea looked at the potential for a housing scheme to deliver a new public car park on site and to contribute to the cost of a new footbridge over the river. Consultation (July 2018) indicated very little community support for this site to be taken forward.

### Availability:

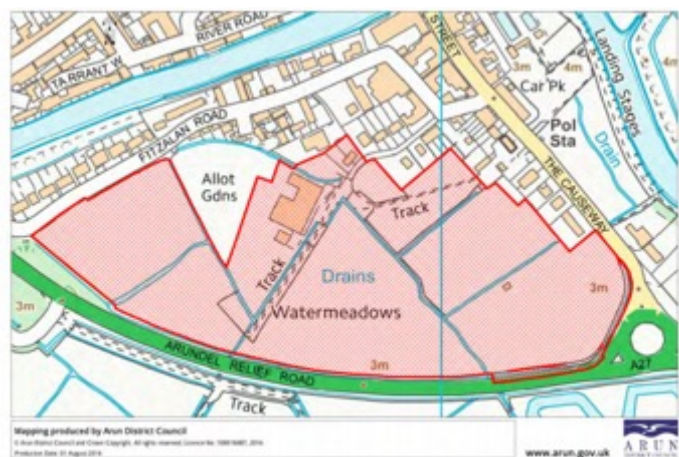
Available (Angmering Park Estate).

### Achievability:

No data to indicate not viable.

### Summary Assessment:

The site is unlikely to pass the flood risk sequential test (as there is sufficient suitable land available for allocation that is not in a flood risk area) and there are other significant policy constraints. There is no over-riding public benefit justifying a departure from national policy in this respect and so it is not considered further.



#### HELAA Assessment Summary Table - Not Currently Developable - Residential Site

Reference	56
Site Location	Mill House Farm
Parish	Arundel
Grid Reference	501881 - 106721
Strategic Allocation Site	No
Neighbourhood Plan Site	No
Site Area	10.12
Net Developable Area	6.07
Viability Typologies	1-LG150
Description of Site and Existing Use	This site borders the northern edge of the A27 and stretches across to the built up area boundary south of the River Arun. The site is predominantly made up of agricultural land, however also contains a farm building. Residential, Agriculture
Settlement	Arundel
Local Plan Area	Inland Arun Area
Existing Use	Residential
Potential Use for Evaluation	Housing
Constraints	Flood Risk 3b under SFRA 2016
Suitability Summary	This is a sensitive site with significant landscape and flooding constraints. Therefore the site is not suitable for housing development. The Neighbourhood Plan may support proposals for a non-residential institution use or for an office use which maintain the farm building
Availability Summary	The site was previously promoted to the council. However, it is unknown as at September 2016
Current Status	Not Currently Developable



## Site 8 – Land off Fitzalan Road

### ADC HELAA:

Forms part of the larger Site 57 Land off Fitzalan Road.

### Suitability:

Lies outside BUAB.

Lies within a Biodiversity Opportunity Area.

Part of Coastal and Floodplain Grazing Marsh.

Lies within Flood Zone 3 (defended), an area with a high probability of flooding. Lies within Setting to Arundel policy designation.

Part of the site lies within the land safeguarded for future flood defence works by Policy 12 of the made Plan.

Original idea looked at the potential for a housing scheme to deliver a new public car park on site and to contribute to the cost of a new footbridge over the river. Consultation (July 2018) indicated very little community support for this site to be taken forward.

### Availability:

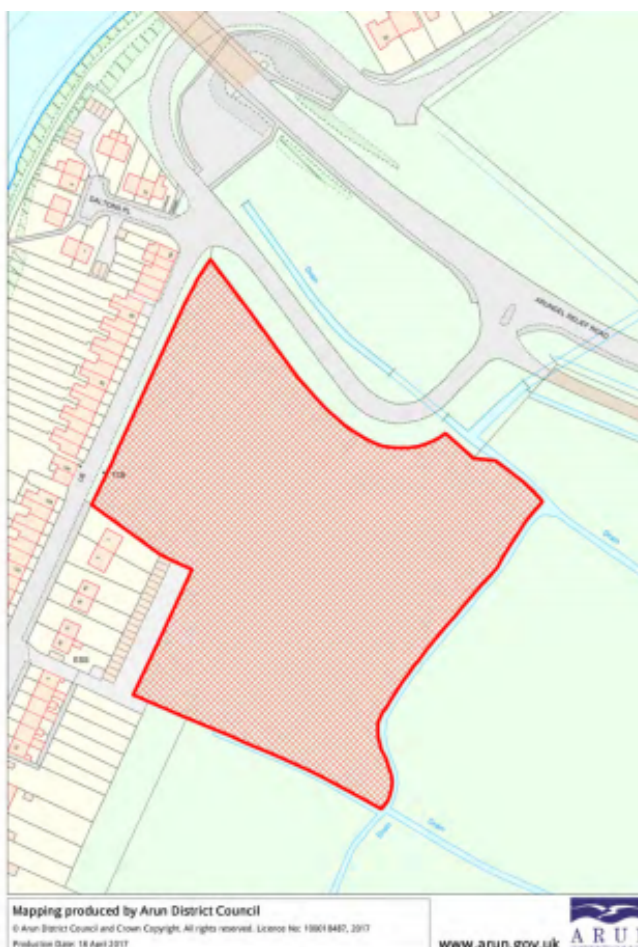
Available (Angmering Park Estate).

### Achievability:

No data to indicate not viable.

### Summary Assessment:

The site is unlikely to pass the flood risk sequential test (as there is sufficient suitable land available for allocation that is not in a flood risk area) and there are other significant policy constraints. There is no over-riding public benefit justifying a departure from national policy in this respect and so it is not considered further.



#### HELAA Assessment Summary Table - Not Currently Developable - Residential Site

Reference	57
Site Location	Land off Fitzalan Road
Parish	Arundel
Grid Reference	501527 - 106587
Strategic Allocation Site	No
Neighbourhood Plan Site	No
Site Area	1.6
Net Developable Area	1.28
Viability Typologies	3-MG50
Description of Site and Existing Use	Flat field bounded by hedges and ditches. Agriculture
Settlement	Arundel
Local Plan Area	Inland Arun Area
Existing Use	Greenfield
Potential Use for Evaluation	Housing
Constraints	Flood Risk. Also the concept of installing a flood defence somewhere on this land as identified on the Arundel Neighbourhood Plan: The Strategy proposes a series of works comprising the construction of a new flood defence wall behind Fitzalan Road and of new flanking defences and the raising of existing defence embankments in some locations. All are shown on the Proposals Map. The ANP therefore proposes that the land required to enable all these works is safeguarded from development.
Suitability Summary	This is a sensitive site with significant landscape and flooding constraints. Therefore the site is not suitable for housing development
Availability Summary	The site has previously been promoted to the Council. However, it is not currently clear if it still remains available for development.
Achievability Summary	Not currently achievable
Current Status	Not Currently Developable



## Site 9 – Land off A27 Roundabout

### ADC HELAA:

Site 58 Electronic Sub Station (land North East of Ford Road).

### Suitability:

Lies outside BUAB.

Lies within a Biodiversity Opportunity Area.

Lies within Flood Zone 3, an area with a high probability of flooding.

Lies in the Setting to Arundel policy area.

The location of the site between the two halves of the town make it potentially suitable for a combination of commercial, community and green infrastructure uses, once the A27 Bypass scheme is implemented.

### Availability:

The site is currently in use by operators of Site 3 and have confirmed that this site is required to continue the viability of the Riding Stables at Site 3. The availability within the next 10 years is doubtful, especially given the A27 Bypass proposals.

### Achievability:

No data to indicate not viable.

### Summary Assessment:

The site may pass the flood risk sequential test if allocated for commercial uses. However, the availability of the land is uncertain, and its development potential is closely related to the implementation of the A27 Bypass proposal, for which there is currently no approved scheme. For these reasons, it is not considered further.



#### HELAA Assessment Summary Table - Not Currently Developable - Residential Site

Reference	58
Site Location	Electronic Sub Station (land North East of)
Parish	Arundel
Grid Reference	501347 - 106785
Strategic Allocation Site	No
Neighbourhood Plan Site	No
Site Area	0.6
Net Developable Area	0.48
Viability Typologies	4-MG25
Description of Site and Existing Use	Large plot with mature trees on all sides. A27 roundabout to the north and River to the east. Horse Paddock
Settlement	Arundel
Local Plan Area	Inland Arun Area
Existing Use	Greenfield
Potential Use for Evaluation	Housing
Constraints	TPO/AB/2/90 TPOAB/1/84; Flood zones 2, 3a & 3b , ground water flooding
Suitability Summary	The site is outside but adjoining the settlement boundary. This site is identified within flood zone 3a where there is a high probability of flooding and where an exception test needs to be passed to justify housing development. The site is therefore not considered suitable for development
Availability Summary	Unknown
Current Status	Not Currently Developable

## Site 10 – Garage, Ford Road

**ADC HELAA:** Forms part of Site 65  
Garage Site, Ford Road

### **Suitability:**

Lies outside BUAB.

Lies within Flood Zone 3, an area with a high probability of flooding.  
Lies in the Setting to Arundel policy area.

### **Availability:**

Available (Angmering Park Estate).

### **Achievability:**

No data to indicate not viable.

### **Summary Assessment:**

The land is too small for allocation and so should not be considered further.



## Site11 – Land West of Ford Road

**ADC HELAA:** Site 66 Land 'South of Stewards Rise' (although note that some of that land is not included in the site boundary submitted by the land owner, i.e. the allotments and Jubilee Gardens)

### **Suitability:**

Although in close proximity to the National Park (some 100m to the west) and forming a part of its wider setting and landscape character, there is no visual or functional relationship with it.

The site lies in the Setting to Arundel policy area, the backdrop of which is partially formed by the National Park.

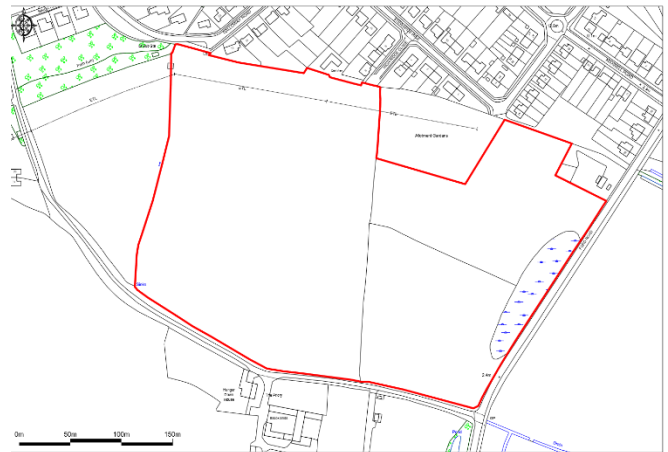
Small part of the site adjacent to Ford Road lies within a Biodiversity Opportunity Area (BOA) and this same part of the site is within Flood Zone 3 (defended), an area with a high probability of flooding.

An area of medieval ridge and furrow visible as a cropmark on aerial photographs recorded as MWS14478 in the Historic Environmental Record (HER).

Scheduled Monument (Tortington Manor) and Archaeological Notification Area to the south of Priory Lane.

Identified in HRA report as foraging ground for Bewick's Swan.

A summary of the evidence reports provided by the landowner to address these constraints (landscape, heritage, ecology, flood risk and highways) is attached to this report as Appendix A.



Although the HELAA indicates that there is the potential for 6.5 Ha of developable land, the mitigation measures required to address the site constraints require a smaller area (as per the SA/SEA). The HELAA also indicates a density of 35 dph, which is considered inappropriately high in this sensitive location. As a result, the land owner has agreed to make available within the whole 8.97 Ha site, a developable area of 3.9 Ha for a scheme of approx. 90 homes at an average density of 23 dph (including the retention of existing hedgerows and the provision of amenity land). The developable area will not include any land that lies in the flood zones or the BOA (and therefore the sequential test does not need to be applied). Nor will the developable land lie in close proximity to the Scheduled Monument at Tortington Manor. However, a small part of the area lies in front of the mature tree and hedge row through the middle of the site. As that part will be more visible in the landscape and of the setting to Arundel beyond, it is especially important that its design responds effectively to this sensitive location; it is not suited to a 'gateway' response of taller, more distinct buildings, as this is not a character of urban edges in places like Arundel. Similarly, the topography and close proximity to the flood plain will require special attention is paid to the use of roadside swales.

The remainder of the site (5.1 Ha) will be used for a combination of SuDs, new allotments, a LEAP, a nursery, new green infrastructure and a new primary road. The topography of the site (gently sloping from west to east on the River Arun valley side) will require a layout that responds well to the site contours. Vehicular access for a scheme of this size is only practical from Ford Road, requiring a road that passes through the flood zone and BOA to the developable area and community land beyond.

There is an additional parcel of land to the immediate west of the site in the same ownership, which has not been made available for development in this plan period. The Town Council is in the process of helping establish an independent, community-controlled Community Land Trust (CLT). Although it is not possible for the Review policy to make it a requirement for the CLT to be a delivery partner in the scheme, the landowner has expressed an interest in this proposal and it will negotiate this further with the Town Council and CLT prior to preparing a planning application.

**Availability:**

Available (Norfolk Estate)

**Achievability:**

The landowner has confirmed that it will be possible to deliver a scheme of this type and with the mitigation measures required without undermining the viability of the allocation. It also intends to secure planning consent quickly so that all of the homes will be delivered in the first five year period of the plan.

**Summary Assessment:**

Although there are a number of policy constraints it is considered possible to mitigate them by limiting the size and density of the net developable area and by avoiding the land of biodiversity value and subject to flood risk. It should also be possible to reserve sufficient land for Bewick's Swan foraging. The allocation policy should make a series of policy requirements to ensure those matters are addressed in a subsequent planning application, in addition to the relevant policies of the Local Plan.

The land is well located to deliver a new community facility (such as a nursery or other similar use), public open spaces and other potential public benefits that may outweigh the residual harm in respect of the policy constraints. The consultation exercise indicated that a majority of the local community supported the basic principles, provided there are clear public benefits arising from the scheme. The Estate is a more benevolent type of landowner and has committed to delivering such benefits – notably the delivery of part of the scheme by the new Arundel CLT – even though they may not be obliged to do so by the limitations of the planning system.



### HELAA Assessment Summary Table - Deliverable - Residential Site

Reference	66
Site Location	Land South of Stewards Rise
Parish	Arundel
Grid Reference	500670 - 106249
Strategic Allocation Site	No
Neighbourhood Plan Site	No
Site Area	12
Net Developable Area	7.2
Viability Typologies	1-LG150
Description of Site and Existing Use	Sloping site with allotments in one section. Overhead power cables run through the site and mature trees and hedging to the boundary of site. Agriculture, Allotments
Settlement	Arundel
Local Plan Area	Inland Arun Area
Existing Use	Greenfield
Potential Use for Evaluation	Residential
Constraints	Low risk of groundwater and higher risk flood zones along Ford Road, Landscape, Biodiversity and Heritage
Suitability Summary	The site has some policy and physical constraints including flooding and landscape, however it is considered that these could be overcome in the longer term to offer a suitable location for development.
Availability Summary	The site was promoted as deliverable in 2018 for 180 dwellings with additional land incorporated.
Achievability Summary	The Arun District Council Local Plan Viability Study of July 2016 assesses that a site like this should be viable
Current Status	Deliverable

### Projected Potential Yields

Suggested Density			Suggested Total Yield			Promoted/Planning Application suggested total yield	
32			216				
2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26
0	0	0	50	50	50	50	16
2026-27	2027-28	2028-29	2029-30	2030-31	2031-32	2032-33	2033-34
0	0	0	0	0	0	0	
50	30	0	0	0	0	0	

## Site 12 – Caste Stables, Arundel Castle

**SDNPA SHLAA:** Site AR004  
(incorrectly named 'Sawmill').

### Suitability:

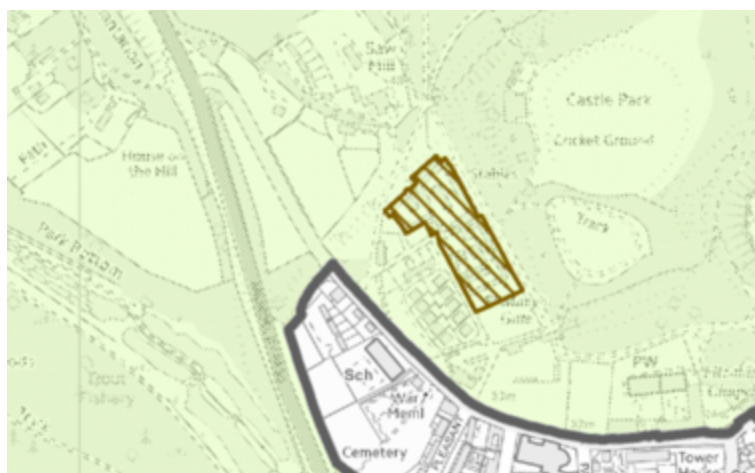
Lies inside National Park.

Lies outside BUAB.

Lies within the Arundel Conservation Area boundary and adjacent to Scheduled Monument (Castle).

In an Archaeological Notification Area.

Deer Barn attached to the SE end of the stables is Grade II listed.



Policy 4 of the Plan allocates this site for up to 16 dwellings.

### Availability:

Available (Norfolk Estate)

### Achievability:

No data to indicate not viable.

### Summary Assessment:

Although a planning application is not imminent, the landowner has confirmed that it still intends to bring forward a scheme in the plan period that will be in line with the requirements of the Policy 4 allocation in the made Plan and so it is not considered further.

Site Ref	Site Address	Settlement	Parish	Recommendation	Total Yield	0-5 Years	6-10 Years	11-15 Years	Rejected/Excluded Reason
AR004	Sawmill, Arundel Park	Arundel	Arundel	Rejected	0	0	0	0	Development of the site would lead to loss of employment land. There is no evidence that the site is being actively promoted or is currently available. The site is subject to landscape, heritage and biodiversity constraints which would require further investigation.

## Site 13 – Blastreat/Greenhurst

**ADC HELAA:** AB10 (Greenhurst) and RU7 (Blastreat) – combined gross site area of 0.36 Ha

### **Suitability:**

Lies partially within Flood Zone 3 (defended), an area with a high probability of flooding.

Lies within Biodiversity Opportunity Area.

Lies in the Setting to Arundel policy area.

HER records first reference to Swallow Brewery from trade directory dating from 1783 at MWS14176.



Policy 5 of the made Plan supports the redevelopment and partial change of use of this site for approximately 24 dwellings comprising a mix of dwelling types (at an approx. density of 60 dph). A planning application for 46 sheltered apartments for sale to the elderly has been made (Renaissance Homes, June 2018). The proposal has required the evidence base of the made policy to be reviewed to justify allocating the land for a mix of dwellings. Using ADC's 'Updated Housing Needs Evidence' report of September 2016 and data held on homes confined to occupation by older households in Arun and Arundel, it is shown that the town has double the proportion of this type (5.1%) than the District (2.6%). In addition, since the making of the Plan, further information has come to light on the local heritage value of the remaining elements on the Blastreat site of the former Swallow Brewery – see Appendix B.

### **Availability:**

Available (Renaissance Homes Ltd)

### **Achievability:**

The landowner has indicated that the policy requirements will undermine the viability of the site. The District Council does not support the viability assessment submitted as part of the planning application, which argues that the scheme cannot deliver affordable housing and cannot incorporate parts of the former brewery structure within a scheme.

A simple viability assessment was undertaken to inform the policy in the made Plan in 2013.

### **Summary Assessment:**

The constraints were addressed by the made Plan allocations and evidence base, notably in respect of applying the sequential and exception flood risk tests and of requiring a scheme to have regard to the Setting to Arundel and heritage policies. The proposal to review the policy does not modify the scheme requirements other than to revisit the housing type evidence base and evidence to support the identification of the Swallow Brewery as a local heritage asset. The flood risk evidence has not changed and there is therefore no need to revisit the sequential test.

The site remains suited to a redevelopment scheme of the type supported in the made policy. The evidence gathered on the proportion of homes in Arundel that are restricted in their occupancy to elderly households indicates that there is a sound case for requiring a mix of open market and affordable dwellings on this and the other



allocated sites in the Plan Review. The District Council has counted the 24 dwellings as a commitment in its housing supply trajectory.

The local heritage value of the remaining features of the former Swallow Brewery is acknowledged by Historic England in its Advice Report of April 2017. Although it dismissed the argument that the features warranted statutory listing, it states that, "the Swallow Brewery has clear local historic interest, as a link to a once major industry and ties to a prominent local family ... (and) is one of the last remnants of a once substantial industrial complex." It goes on to state that, "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", which may otherwise have warranted further consideration for statutory listing.

In its Heritage Statement of March 2018 in support of the planning application, WYG argues that the local heritage interest is very limited and does not accord with the criteria for inclusion on the District Council's List of Buildings or Structures of Character (2005). However, in confirming its Article 4 Direction to prevent the demolition of any extant structures on the site without planning permission, the District Council disagreed. In its determination of the planning application, the District Council recognized that despite not warranting statutory listing, "the frontage building is nevertheless a heritage asset and it makes a strong contribution to townscape character" (and thereby accords with two of the List criteria). The conflict with Policy HERSP1 of the adopted Local Plan in this specific respect was one of the reasons for the refusal of the planning application.

The community consultations indicate that a majority of local people continue to support the principle of a redevelopment scheme on these two adjoining sites (and the loss of employment land in the town), but only if a scheme comprises a mix of homes and retains part of the former brewery structure.

In summary, it is therefore considered that it is reasonable to modify the made Plan policy to make the expectations for a development scheme clear, based on the evidence now available.

Reference	AB10
NLPG	1.00E+11
Site Address	Greenhurst, Fitzalan Road
Grid ref	501917-106893
Parish Group	Arundel & Surrounding Area
<b>Parish</b>	<b>Arundel</b>
Settlement	Arundel
Site Area (ha)	0.14
Net Developable Area (ha)	0.14
Viability Typologies	13-MB12
Description of site	Large detached dwelling
Existing use	Residential dwelling
Constraints	Flood Zone 2, 3a& 3b; Biodiversity Opportunity Area
Potential use for evaluation	Residential
Suitability Summary	The site is considered to be suitable site for housing - this site together with the adjoining Blastreet Site RU7 have been assessed under the Neighbourhood plan as being suitable.
Availability Summary	the site not currently being promoted business currently operational
Achievability Summary	According to the Arun Local Plan Viability Study 2016 the site is considered to be viable and achievable
Current Status	Deliverable

### **Projected Potential Yields**

Suggested Density			Suggested Total Yield			Promoted/Planning Application suggested total yield	
<b>45</b>			<b>6</b>			<b>6</b>	
2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
<b>0</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	
<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	

Reference	RU7
NLPG	1.00062E+11
Site Address	Blastreet, Fitzalan Road
Grid ref	501917-106893
Parish Group	Arundel & Surrounding Area
<b>Parish</b>	<b>Arundel</b>
Settlement	Arundel
Site Area (ha)	0.23
Net Developable Area (ha)	0.23
Viability Typologies	13-MB12
Description of site	A small site consisting of industrial units to the east and a large detached property to the west.
Existing use	Iron Mongers
Constraints	Flood Zone 2, 3a& 3b; Biodiversity Opportunity Area
Potential use for evaluation	Housing
Suitability Summary	More suitable site for housing - this has been assessed under the Neighbourhood plan. Low profile employment site within residential area. Single established occupier. Units are in average condition but adequate for operations albeit the site appears to be at capacity. Constrained site, with limited scope for intensification. Flood protection measures would need investigating. No indication that occupier is preparing to relocate or redevelop in short term.
Availability Summary	Not currently available but considered a developable site in the longer term if the business does relocate
Achievability Summary	According to the Arun Local Plan Viability Study 2016 the site is considered to be viable and achievable
Current Status	Developable

### **Projected Potential Yields**

Suggested Density			Suggested Total Yield			Promoted/Planning Application suggested total yield	
<b>45</b>			<b>10</b>				
2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>10</b>	<b>0</b>
2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	
<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	

## Site 14 – Land at Ford Road (Old Gas Works Site)

**ADC HELAA:** Site 115.

### **Suitability:**

Lies inside BUAB.

Lies in the Setting to Arundel policy area.

Lies within Flood Zone 3 (defended), an area with a high probability of flooding.



### **Availability:**

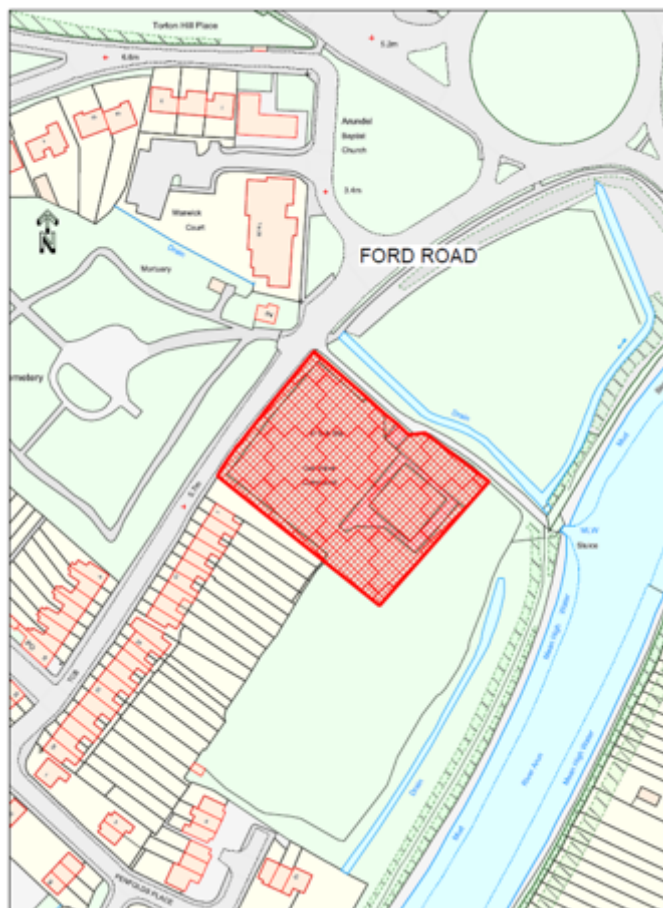
Available (Angmering Park Estate).

### **Achievability:**

No data to indicate not viable.

### **Summary Assessment:**

A planning application is known to be imminent and the pre-application consultations indicate that the scheme will be in line with the requirements of the Policy 4 allocation in the made Plan and so it is not considered further.



Reference	115
NLPG	2.00003E+11
Site Address	Electronic Sub Station, Ford Road
Grid ref	501295-106735
Parish Group	Arundel & Surrounding Area
<b>Parish</b>	<b>Arundel</b>
Settlement	Arundel
Site Area (ha)	0.43
Net Developable Area (ha)	0.34
Viability Typologies	13-MB12
Description of site	The site is a very overgrown plot with a former electrical substation building. Located on approach to Arundel off Ford Road.
Existing use	Vacant, Former Town Gas works
Constraints	Ground contamination from the previous use of the site as a former town gas works. Located in flood zone 2 and 3a (July 2016 SFRA). Assuming that the site passes the exceptions test for development within a flood zone, there will be additional abnormal construction cost in raising slab levels and maintaining flood storage capacity. This may in effect mean that buildings would be on stilts with flood storage voids beneath. Council identified groundwater emergence zone and groundwater flood risk. Visibility for road access is restricted in both directions.
Potential use for evaluation	Housing
Suitability Summary	There may be some opportunity for part of the site to be used for housing as allocated in the Arundel Neighbourhood Plan, subject to overcoming the setting of Arundel policy and appropriate flood alleviation. Site identified within flood zone 3a where an exception test needs to be passed to justify housing development.
Availability Summary	Arundel Town Council confirm land owner is in talks with national grid, through their agents Paribas to develop the site
Achievability Summary	According to the Local Plan Viability Assessment this site may not be viable, in addition there will likely be extra costs for flood alleviation
Current Status	Developable

### **Projected Potential Yields**

Suggested Density	Suggested Total Yield	Promoted/Planning Application suggested total yield
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35			37				
2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
0	0	0	0	0	0	0	0
2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	
0	0	0	37	0	0	0	



## Site 15 – Industrial Units on Fitzalan Road

**ADC HELAA:** Forms part of Site RU6.

**Suitability:**

Lies within Biodiversity Opportunity Area.  
Lies in the Setting to Arundel policy area.  
(Note: land does not lie in Flood Zone 2 as  
stated in the HELAA).

The land has been identified in the Task Group work and by the Streetscene project. It currently comprises approx. 12 small workshop units, only half of which appear to be occupied at the present time.

**Availability:**

Not available.

### Achievability:

No data to indicate not viable.

### Summary Assessment:

The land is unavailable and so is not considered further.



Reference	RU6
NLPG	10091568617
Site Address	Fitzalan Road West, Arundel
Grid ref	501797-106895
Parish Group	Arundel & Surrounding Area
<b>Parish</b>	<b>Arundel</b>
Settlement	Arundel
Site Area (ha)	0.17
Net Developable Area (ha)	0.17
Viability Typologies	14-SB8
Description of site	Small site, level and regular in shape. Single dwelling and garden curtilage to east included within boundary for limited expansion potential but currently occupied.
Existing use	Small light industrial workshops and ancillary offices and single dwelling. Commercial (Existing employment site not allocated in Local Plan)
Constraints	Floodzones 2, 3a & 3b. Within 'setting of Arundel' (Policy Area 3) restricting development that would affect the rural views from the town or views of the Castle or Cathedral. Conservation area on opposite side of river. Possible contaminated land. Possible rare species close to site.
Potential use for evaluation	Commercial (Continued B1(c))
Suitability Summary	Within settlement of Arundel but separated by the River Arun. No shops in the immediate vicinity but a short 500m walk to town centre with range of services and close to residential areas. Within 200m of bus stop serving Littlehampton every 30 mins
Availability Summary	Comments from consultation say site in use as light industrial. Land owner confirmed that it is not available for the time being (sept 2016)
Achievability Summary	According to the Arun Local Plan Viability Study 2016 the site is considered to be viable and achievable
Current Status	Developable

### **Projected Potential Yields**

Suggested Density			Suggested Total Yield			Promoted/Planning Application suggested total yield	
45			8				
2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
0	0	0	0	0	0	0	0
2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31	
0	0	0	0	0	8	0	

## Site 16 – Crown Yard

**ADC HELAA:** None.

### **Suitability:**

Lies within Arundel Conservation Area and the Town Centre boundary with adjoining secondary retail frontage. In an Archaeological Notification Area.



The land has been identified in the Task Group work and by the Streetscene project. It currently comprises a small public car park with some private spaces for adjoining businesses. The car park has been identified in the Streetscene project as having potential to create a new public events space for the town together with additional town centre/workspace/residential uses around its periphery. This idea can only be realised if the car parking spaces are re-provided elsewhere in the town as part of the Plan. However, the land owner (Arun DC) has confirmed that it will not make the land available for this purpose.

### **Availability:**

Not available (Arun DC).

### **Achievability:**

No data to indicate not viable.

### **Assessment:**

The land is unavailable and so is not considered further.



## Site 17 – Arundel Police Station

**ADC HELAA:** None.

### **Suitability:**

Lies in the Setting to Arundel policy area.

Lies within Flood Zone 3, an area with a high probability of flooding.



The land was submitted by Sussex Police during the assessment process. It has confirmed that the site may be available in the later part of the plan to contribute to the provision of housing. The Station is not an operational Police Station, however the site acts as a base for the Roads Policing Unit in West Sussex with the building currently being used as a working office. A wider project on Road Policing across Sussex mean that there may be a relocation of the current users of the site which will then leave the site vacant.

The site was not included in the informal consultation exercise. However, was raised by some members of the public as a potential housing allocation site. It should therefore be considered for allocation for approximately 12 dwellings (based on a density of approx. 10 – 15 dph on 1 Ha), subject to a number of mitigation measures being delivered to address the various environmental and flood risk constraints.

### **Availability:**

Not currently available but will be later in the plan period (Sussex Police).

### **Achievability:**

No data to indicate not viable.

### **Summary Assessment:**

In respect of the flooding constraint, the NPPF states (in §157) that, “all plans should apply a sequential, risk-based approach to the location of development ... so as to avoid, where possible, flood risk to people and property ... by applying the sequential test and then, if necessary, the exception test.” However, §164 states that changes of use – for example from a non-residential institution to a residential use – are not subject to the sequential or exception tests, “but should still meet the requirements for site-specific flood risk assessments”.

A key objective of the made Neighbourhood Plan, which is retained for the Neighbourhood Plan Review, is that of encouraging the reuse of brownfield land within the defined built-up area boundary. This forms an important means by which both Plans contribute to the achievement of sustainable development in Arundel, by reducing the dependence on greenfield sites outside of the boundary for new housing development.

The Police Station site is located in but, as with much of the town, the land is protected by existing flood defences, for which there has been a strategy for upgrading in recent years. The site is operational but is expected to become available for redevelopment during the plan period. A residential use is justified as the surrounding land uses are almost all residential. The retention of the site as a form of ‘non-residential institutional’

use is not considered realistic given the specific configuration of the buildings and the high cost of redeveloping the site.

Importantly, the 'flood risk vulnerability classification' set out in Table 2 in the Planning Policy Guidance (§7-021) identifies police stations as 'highly vulnerable' to flood events but dwellings are only classed as 'more vulnerable'. In which case, the change of use of this site through an allocation in the Neighbourhood Plan will improve the current state, provided a flood risk assessment can demonstrate that a suitable scheme can be designed for the site. It is the intention is to reserve the land for allocation in the later part of the plan period, and to make the release of the land for development, subject to the provision of such an assessment.

Although there are policy constraints it may be possible to overcome them with careful design, especially in limiting building heights and density to reflect the character of residential development along the road. The land is also very well located with community facilities nearby. The land should therefore be considered for allocation.

## **Site 18: Land at Cemetery, London Road**

**ADC HELAA:** Site AB3, adjacent to Site AB4.

### **Suitability:**

Lies within the Arundel Conservation Area.

Lies outside BUAB.

In the setting of the South Downs National Park.

### **Availability:**

Not available.

### **Achievability:**

No data to indicate not viable.

### **Summary Assessment:**

The land is unavailable and therefore excluded from further consideration.

Reference	AB3
NLPG	10091568398
Site Address	Land at Cemetery, London Road
Grid ref	501307.31-107195.15
Parish Group	Arundel & Surrounding Area
<b>Parish</b>	<b>Arundel</b>
Settlement	Arundel
Site Area (ha)	0.34
Net Developable Area (ha)	0.34
Viability Typologies	5-MG12
Description of site	The site consists of a wooded / vegetated area to south of cemetery. The site backs onto the A284 and is located on the edge of the urban area. Sites AB4 and 62 are located directly to the north.
Existing use	Cemetery, Woodland
Constraints	The site is separated from other residential areas. There is concern over earth stability as the site slopes steeply towards the Arundel By-pass. Vehicular access is an issue and so is the site's close proximity to the Cemetery. The site is located within a groundwater emergence zone and there is potential for groundwater flood risk.
Potential use for evaluation	Housing
Suitability Summary	The site is located adjacent South Downs National Park. Outside but adjoining the settlement boundary. Currently development on this site would contravene policy and therefore the site would not be considered suitable. The site is not suitable for future development in isolation, however, the site could be considered as part of a comprehensive development including adjacent land (Sites AB4 and 62). If planned comprehensively this could contribute to the creation of a sustainable, mixed community
Availability Summary	Need to check latest availability
Achievability Summary	According to the Arun Local Plan Viability Study 2016 the site is considered to be viable and achievable
Current Status	Developable

### **Projected Potential Yields**

Suggested Density			Suggested Total Yield			Promoted/Planning Application suggested total yield		
30			10					
2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	
0	0	0	0	0	0	0	0	
2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31		
0	0	0	0	0	0	10		

## **Site 19: Land Rear of Primary School, London Road**

**ADC HELAA:** Site AB4, adjacent to Site AB3.

### **Suitability:**

Lies within the Arundel Conservation Area.

Lies outside BUAB.

In the setting of the South Downs National Park.

### **Availability:**

Not available.

### **Achievability:**

No data to indicate not viable.

Availability:

### **Summary Assessment:**

The land is unavailable and therefore excluded from further consideration.

#### HELAA Assessment Summary Table - Not Currently Developable - Residential Site

Reference	AB4
Site Location	Land south west of St Philip Catholic Primary School
Parish	Arundel
Grid Reference	501275 - 107266
Strategic Allocation Site	No
Neighbourhood Plan Site	No
Site Area	0.25
Net Developable Area	0.25
Viability Typologies	6-SG8
Description of Site and Existing Use	The site is relatively flat used as private open space. The site is currently used as a football pitch located on the edge of the urban area. Private Open Space - Football Pitch
Settlement	Arundel
Local Plan Area	Inland Arun Area
Existing Use	Greenfield
Potential Use for Evaluation	Housing
Constraints	There is a concern over earth stability as the site slopes steeply to the Arundel by-pass, Vehicular access is an issue and so to is the sites close proximity to the cemetery. The site is located within a groundwater emergence zone and there is potential for groundwater flood risk
Suitability Summary	Outside but adjoining the settlement boundary. Currently development on this site would contravene policy and therefore the site would not be considered to be suitable. The site is not suitable for development if considered in isolation, however, the site could be considered as part of a comprehensive development including adjacent land (Sites AB3 and 62). If planned comprehensively this could contribute to the creation of a sustainable, mixed community. However, it would lead to the loss of open space for the school.
Availability Summary	As at October 2016 Site is not available as used as a football pitch for the school.
Current Status	Not Currently Developable

#### **4. Summary**

By applying the exclusionary criteria, sites 1, 2, 3, 6, 10, 18 and 19 have been excluded from further consideration. In addition, sites 4, 5, 12 and 14 have already been allocated by the made Neighbourhood Plan and no information was provided to indicate that the allocations would not be developed within the new plan period.

The remaining eight sites – 7, 8, 9, 11, 13, 15, 16 and 17 – were the subject of an informal consultation exercise with the local community and landowners in summer 2018 to ascertain preferences, given that not all of the sites would be required to meet the 'indicative housing figure'. The indication was that sites 11 (Ford Road) and 17 (Police Station) would be most favoured and that, given the interest in the planning application made for Site 13 ('Blastreat/Greenhurst'), the opportunity should be taken to replace the made Plan policy.

With sites 15 and 16 unavailable, site 8 premature (pending decisions on the A27 Bypass) and sites 7 and 9 not carrying enough public support to overcome their failure to pass the flood risk sequential test, only sites 11, 13 and 17 were suitable, available and achieve to consider for allocation in the Review.

## **APPENDIX A:**

### **LAND AT FORD ROAD TECHNICAL EVIDENCE SUMMARY REPORTS**

- **BIODIVERSITY**
- **FLOOD RISK**
- **HERITAGE**
- **LANDSCAPE**
- **TRANSPORT**



### **Introduction**

This document provides a brief summary of the ecological work that Engain have undertaken to date in relation to the land at Ford Road, Arundel. It summarises the results of our assessments and the conclusions drawn from them, and briefly describes the ecological constraints and opportunities presented by the site.

### **Ecological Character of the Site**

The proposed development site consists of one arable field and one field of agriculturally improved grassland, which have little ecological value. The site's most valuable habitats are the mature hedges that border the westernmost field and bisect the site in the middle, and the mature trees that these hedges contain. There is also a small area of marshy grassland on the boundary with Ford Road. Whilst this is of negligible interest at a wider scale, since it is a very common and widespread habitat type, it is notable in comparison with the low value of the surrounding field. It is also included within the Biodiversity Opportunity Area identified in the Arun District Local Plan under Policy ENV DM3.

The hedges and trees provide good potential habitat for a range of wildlife including bats (of which three of the rarest species have been recorded in the local area), dormice (which are known to be present in a nearby woodland), reptiles, birds (including some rarer species such as yellowhammer) and potentially great crested newts. The presence or otherwise of these species within the hedgerows would be verified by surveys conducted at the appropriate time. A desk-based assessment concluded that the site is unlikely to be used by over-wintering Bewick's Swans, and the application of the relevant Neighbourhood Planning policies would be sufficient to address this matter.

### **Biodiversity Constraints and Opportunities**

Given the negligible ecological value of the open fields, the site has capacity to accommodate some development, subject to the protection and enhancement of its most ecologically valuable features. The hedgerows would need to be retained, protected from artificial lighting and managed in the future to ensure they continue to function as wildlife corridors and potential habitat for important species. Where it is necessary to create breaks in any of the hedgerows, minimising the width of the breaks and creating alternative habitat would help to maintain functional connectivity.

In situations like this, where the baseline habitats are overwhelmingly of limited value, creating a biodiversity net gain is more than feasible through the creation of new and ecologically valuable habitats.

These would work best when they are designed as part of a multifunctional network of green infrastructure that contributes to value for residents, manages water issues as well as offers habitat for wildlife. Locally-focussed habitat creation might include new hedgerows, expanded wetland features including some permanent standing or flowing water, new bat roosting habitat, nest boxes for birds and species-rich meadows.

### **Conclusions**

The site's primary ecological value is associated with the boundary features, which are likely to be used by a range of common wildlife and may also be used by some rare species. Maintaining these habitats and their functional connectivity, whilst enhancing the open space around them, has great potential to create a net biodiversity gain for the site.

## TECHNICAL REPORT

Prepared on behalf of Savills



Date : 04/04/2019

Project : Land at Tortington, Arundel

Project Ref : 173482

Report Ref : 173482-01

### DOCUMENT CONTROL

REV	ISSUE PURPOSE	AUTHOR	CHECKED	APPROVED	DATE
-	For Information	GA	CC	DRAFT	04/04/2019
-	For Planning	LB	CC	BC	05/04/2019

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**SITE: Land at Tortington, Arundel**

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## **1.0 INTRODUCTION**

Ardent Consulting Engineers (hereafter referred to as Ardent) has been commissioned by Savills to provide an overview of flood risk and appropriate mitigation measures at a Site Tortington Arundel BN18 9EX in West Sussex. The site is bounded by residential properties to the north, Ford Road to the east and Priory Lane to the west and south.

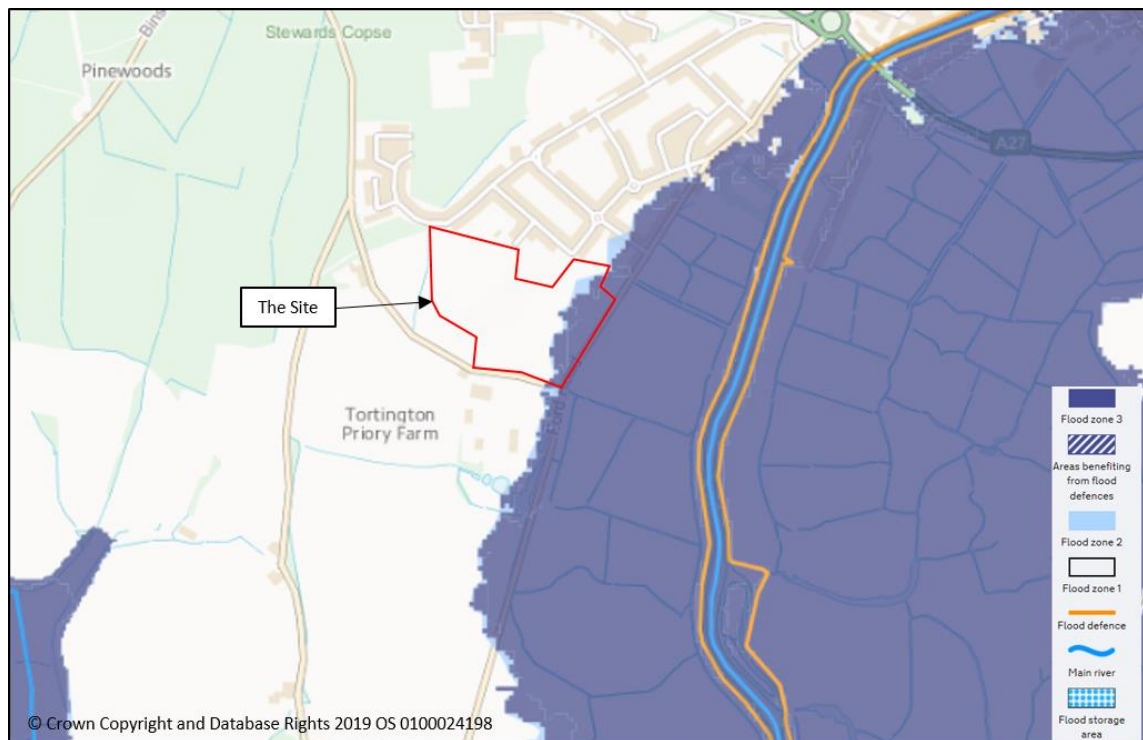
## **2.0 FLOOD RISK OVERVIEW**

### **2.1 Fluvial Flood Risk**

The Environment Agency's online flood mapping indicate that the Site is located within Flood Zone 3 associated with the River Arun. This is identified as Land having a 1 in a 100 or greater annual probability of river flooding and is the high probability zone.

The site, which is classified as 'More Vulnerable', and situated in Flood Zone 3 is required to undergo the Sequential and Exception Tests under the requirements of the NPPF.

However, Flood Zone 3 covers only the land towards the eastern site boundary as shown in **Figure 2** below. The remainder of the site is located within Flood Zone 1 identified as having an annual probability of fluvial flooding of less than the 1 in 1,000 year flood event (<0.1%).



**Figure 2:** Tidal Flood Risk

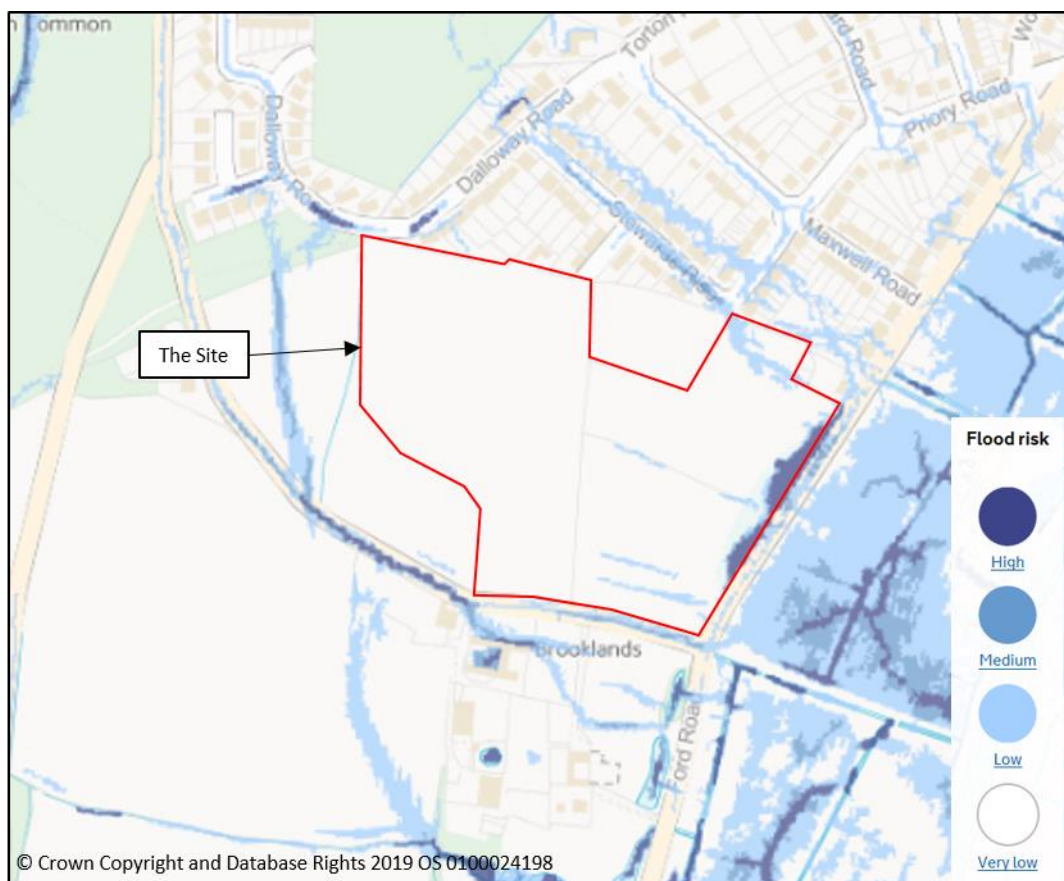
Updated climate change allowances have superseded the previous allowances and been applied to all new developments since February 2016. The Site is situated within the South East river basin district. In accordance to 'Flood risk assessments: Climate Change Allowances', for More Vulnerable developments in Flood Zone 3, the "Upper End" climate change allowance for the '2050s' (1 in 100yr + 40%) is the minimum benchmark for flood risk mitigation. For sensitive locations, it may be necessary to use the "Upper End" allowance for the '2080s' (1 in 100yr + 85%) to inform built in resilience.

Due to the proximity of the Site to the River Arun the new climate change outlines will need to be assessed and inform the masterplan and finished floor levels for the site. However, preliminary studies indicate that the proposals are achievable and feasible as an emergency access will be provided for the occupants onto Dalloway Road during an extreme event.

## 2.2 Surface Water Flood Risk

The EA Flood risk from surface water map, see **Figure 3** below, shows the majority of the site is at "very low risk" of surface water flooding.

However, there are parts of the site which are prone to surface water flooding and are highlighted to lie within a "Medium" to "High" risk of surface water flooding, which are classified as having an annual probability of surface water flooding of greater than 3.3% (1 in 30 year return period) and 1% (1 in 100 year return period) respectively. These areas correlate with some existing land boundary ditches, which are generally low lying areas in comparison to the rest of the site, and small areas of ponding water, presumably representing topographic low points within the site. The surrounding roads are mainly at "Low" risk of surface water flooding.



**Figure 3:** Flood risk from surface water

**3.0 FLOOD RISK MANAGEMENT**

The new Climate Change allowances will need to be assessed for the Site. It is proposed that all residential units are located outside the 100yr + 40% CC event. For all developments located within the 100yr + 40% CC outline, floodplain compensation will need to be provided. Finished Floor Levels for the residential units will need to be set 300mm above the predicted 100yr + 40% CC level.

Safe access and egress to the Site will be available via Ford Road with an emergency access onto Dalloway Road, heading north away of the floodplain.

Existing and future surface water runoff rates would be assessed and managed through a formal drainage network and attenuation storage. The proposed drainage strategy will minimise the surface water flood risk by being designed to ensure no flooding across the Site for up to and including the 100 year return period including 40% for climate change; this will be achieved through the use of SuDS and a vortex flow control. The hierarchy will be utilised in the decision making process to ensure that the proposed development will not increase flood risk offsite.

Surface water run-off across the Site during exceedance events will be contained within the proposed access roads/car parking areas of the development.

The above measures will ensure that the flood risks associated with the Site, can be managed appropriately.



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# Heritage Assessment Summary

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Land at Ford Road, Arundel



# Heritage Assessment Summary

Land at Ford Road, Arundel

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## Contents

1.	Heritage and Archaeology	1
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## 1. Heritage and Archaeology

### 1.1. Site Description

- 1.1.1. The Site is located on the north side of Priory Lane along the settlement edge of Arundel, measuring 12 ha in size. On the south side of Priory Lane, is the Scheduled Monument 'Tortington Augustinian priory and ponds, including part of priory precinct' (NHLE: 1221996), and the Grade II\* Listed 'Tortington Priory Barn, to the north of Priory Farm' (NHLE: 1021459).

### 1.2. Site Archaeology

- 1.2.1. The Scheduled Monument 'Tortington Augustinian priory and ponds, including part of priory precinct' (NHLE: 1021459), contains below ground archaeological remains with great potential, including a chapel, claustral buildings and ponds, the area is also part of an Archaeological Notification Area (DesigUID: DWS8481) which extends north to include Brooklands (part of the old Priory Farm) and St Mary Magdalene's Priory Church approximately one kilometre to the south of Tortington Priory. Excavation finds here include; to the east, the remains of a causeway and a Mesolithic Tranchet Axe and to the south some Roman pottery sherds and tiles dating from the Bronze Age and Roman period, and some flint found nearby to St Mary Magdalene's Church in Tortington.
- 1.2.2. It is acknowledged that the existence of hitherto unrecorded buried archaeological remains may exist within the ANA of 'Tortington Priory and associated features' (DesigUID: DWS8481), however the Site is located beyond the northern extent of the ANA and in itself is not recognised as having archaeological importance. There is no known archaeology within the 'Land at Ford Road'.

### 1.3. Setting

- 1.3.1. The Grade II\* Listed 'Tortington Priory Barn, to the north of Priory Farm' (NHLE: 1021459), and the Scheduled Monument 'Tortington Augustinian priory and ponds, including part of priory precinct' (NHLE: 1221996), have associative historic links which date back to the 12th century. The asset grouping of the Grade II\* listed Barn and the Scheduled Monument provides protection to the physical setting of what remains of the Priory.
- 1.3.2. To the east lining the riverside and demarking the fields edges are built banks and brooks which once would have formed part of the field system of the Priory. These also contribute to the significance of the Scheduled Monument and the Grade II\* listed Barn, by providing information and understanding of how the historic environment would once have looked and functioned.

### 1.4. Impact assessment of Proposed Development

1.4.1. Impacts to designated and non-designated heritage assets arise where changes are made to their physical environment by means of the loss and/or degradation of their physical fabric or setting, which in turn leads to a reduction in the significance of the asset. The impacts of the proposed development upon the heritage assets must be understood, and the proposed development must seek to preserve or enhance the significance of each heritage asset, in accordance with national legislation and national and local planning policy.

1.4.2. The proposed development scheme on 'Land at Ford Road' involves the construction of 90 dwellings with associated access directly off Ford Road, south of the town of Arundel. The proposed development scheme acknowledge the historic environment in which the Site is located. The scheme design will preserve the significance of the heritage assets in the vicinity.

#### *Field Bordering Ford Road*

1.4.3. There will be minimal development in the field that borders Ford Road; any development that is proposed will be in the north west of the field, and will utilise existing hedges, screening views towards the Scheduled Monument and listed building. This will maintain open views towards the town of Arundel and the Castle, and protect the setting and legibility of the Grade II\* listed 'Tortington Priory Barn' (NHLE: 1021459), and Scheduled Monument 'Tortington Augustinian priory and ponds, including part of priory precinct' (NHLE: 1021459).

1.4.4. There will be a large buffer zone directly in front of Tortington Priory and the Scheduled Monument, which will be softened with planting, this will respect the setting. The north elevation of the Priory contains no windows or views over the proposed development site and is situated within a large area of open land which physically isolates it from the surrounding area.

#### *Middle Field*

1.4.5. In the middle field on the north side of Priory Lane the proposed access into the Site there will be a large buffer zone on the south side. This large open space in front of the Grade II\* listed Barn and Priory site has been designed to respect the setting of the Scheduled Monument and Grade II\* listed Barn.

1.4.6. The proposed development in the middle field will not affect the setting of the Scheduled Ancient Monument and the Grade II\* listed Barn as it is sufficiently removed from the Heritage Assets so as not to impact on their setting.

# Heritage Assessment Summary

Land at Ford Road, Arundel

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- 1.4.7. There will be informal tree planting achieved by the use of green fingers through the development. This will reduce the impact of the proposed development upon the wider setting, providing a soft buffer to Stewards Copse to the north and the wider landscape of Tortington Common to the west. Tree planting will also allow for intervisibility between the Site, the Scheduled Monument and the Grade II\* Listed Barn to remain.
- 1.4.8. The proposed development is not considered to pose any impact upon the heritage assets within Arundel, and special regard has been given to the views that exist to the Castle from the Site which will be unaffected by the proposed development.

## 1.5. Conclusion

- 1.5.1. In the 1950's extensive development occurred to the south of the A27 on the outskirts of Arundel this area makes up Priory Hill Road and Torton Hill Road, its north edge borders the Site. As such 'Land at Ford Road' can, because of its proximity to existing housing, be considered a natural extension to the town of Arundel.
- 1.5.2. The two proposed buffer zones within the constraints plan, and the proposed siting of the 400m2 LAP in the middle field create a large open space in front of the development, this is designed to respect and not encroach on the setting of the Scheduled Monument or the Grade II\* Listed Barn.
- 1.5.3. Tree planting will provide soft edges to the proposed development, which over time will help enhance views and define the character of the site. Views to Aundel Castle from Ford Road, will remain as they are, further to this there will be no development directly adjacent to Ford Road, preserving existing views to the South Downs to the south and east.
- 1.5.4. It can be concluded in this instance that the impact of development on the 'Land at Ford Road' to the Scheduled Monument and Grade II\* listed Barn is neutral and on balance that any subsequent planning application would not be overly constrained by heritage considerations.

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# Promotion of Land at Tortington, Arundel

## Landscape and Visual Baseline Appraisal Summary

(Refer to DLA/1822/LVBA/RPT/01/Rev B Planning Issue March 2019 for full report)

This executive summary has been produced to provide an outline of the findings of an initial Landscape and Visual Baseline Assessment (LVBA) prepared by Davies Landscape Architects Ltd (DLA) for the above Site. The LVBA provides a desk top and site study appraisal of the potential landscape and visual resources of the Site and surrounding area. The appraisal has been used to provide a landscape led approach to the development framework plan which has evolved through the identification of key initial constraints, opportunities and potential capacity. Site visits were carried out during September 2017 and February 2019. This document should be read in conjunction with the Masterplan and Vision Statement prepared by Savills and the other technical reports submitted as part of the promotion.

Overall, it is considered that assessing against the initial baseline Landscape and Visual criteria, the proposed layout can be successfully assimilated into the existing landscape and settlement framework and provide benefits to the current setting.

### Location

The Site is located to the southwest of Arundel, (OS reference centred TQ 00606 06274) and consists of two fields bordered to the north by the Arundel settlement boundary (Stewards Rise and High Ridge Close) and Priory Road allotments. The eastern boundary is formed by Ford Road, a main access route between the town and the south coast whilst the southern boundary in comparison is defined by a single-track local lane (Priory Lane). The western boundary is formed by a ditch and treed hedgerow.

There is currently no public access to the Site.

### Policy and Designations

The development framework has been considered to reflect the aims and aspirations of the Arun Local Plan 2011-2031 and the Arundel Neighbourhood Plan review (Pre-Submission Plan Nov 2018). In summary these require any proposed development to:

- Protect and enhance key views towards the Arundel Historic Core and reflect its special character within the setting of the town;
- Protect the setting and experiences of the South Downs National Park (SDNP);
- Protect, enhance and reconnect existing natural features such as trees and hedgerows ensuring their longevity and value;
- Increase opportunities for biodiversity through connectivity and habitat creation as part of a wider Biodiversity Opportunities Area (BOA) and Green Infrastructure network (GI); and
- Provide open space in accordance with policy requirements, including a Local Equipped Area of Play (LEAP) and potential allotments as part of a wider public open space.

These reflect the fundamental issues that have been considered and included as part of the proposed layout and have been further refined through Site specific technical studies.

The development framework will provide an excess of the 0.44ha open space required by policy. The masterplan currently shows approximately 4.4ha (3.7ha without SuDS) of open space and Green Infrastructure. The Site does not reach the required threshold for allotments however there is an opportunity to extend existing plots to create a community food garden/orchard within the emerging neighbourhood policy. The topography of the Site is not practical for pitch sports, however the required land budget has been retained and will form part of an informal parkland area to the east.

There are no Statutory Designations covering the site or adjoining features.

The boundary to the SDNP lies approximately 230m west, defined by Tortington Lane. As such the assessment looked specifically at any potential impacts upon the setting or experiences of the park.

To the south of Priory Lane, and eastern section of the Site, lies the northern extents of Tortington Augustinian Priory and pond which is designated as a Scheduled Ancient Monument (SAM). There are no physical features visible from the Site. The eastern section of the Site has remained undeveloped to protect the setting.

Protected features that may be affected by development are limited to the tree belt which separates the field and is protected by a Tree Preservation Order (TPO). The protection and enhancement of this has formed one of the main constraints to the development framework. Further arboricultural work will be undertaken to get a full understanding of the condition of the belt and refine any constraints and opportunities.

## Landscape

### *Landscape Character*

The study identified the Site as lying within the following Landscape Character Areas. These assessments define the key features that contribute to the character of a landscape and its setting.

Assessment	Landscape Character Area (LCA)/Type(LCT)
West Sussex County Council - A Strategy for the West Sussex Landscape	LCT: Upper Coastal Plain & LCA: SC8 - Fontwell Upper Coastal Plain
Arun Landscape Study	LCA: 32 Tortington Arun Valley Sides
Arundel Village Design Statement	Character Area (CA)7

The first two assessments describe the wider rural undeveloped landscapes with minimal focus on the landscapes adjoining settlements therefore the Site has negligible evidence of or contribution to the elements that form the key defining characteristics of the wider area. The exception to this is the influence of woodland and hedgerow cover which provide enclosure within the landscape in comparison to the open Arun valley floor which lies to the east of Ford Road. This is influential in limiting effects of the proposals upon the experiences of the SDNP and surrounding landscape. Both assessments identify the potential influence of the settlement boundary on the setting to Arundel. It is considered that through careful design and landscape there is potential to improve the current baseline.

The Arundel Village Design Statement describes the character of the urban development to the north. Whilst the built vernacular is predominantly characteristic of the era (1940s onwards) rather than the historic town, it does identify development patterns that should be considered in the successful assimilation of the new settlement to the current boundary. The alignment of roads and development block to the typography has been continued into the masterplan layout with permeability between the Site and the existing settlement.

The elements and key features of these assessments, both negative and positive, have been considered as part of the development framework to ensure that the development respects and contributes to improving the Site's current contribution to the landscape character and setting of Arundel.

### *Site Condition*

The landuse within the Site is low/moderate quality arable/pastoral and does not represent a rare or diminishing landuse within the character assessments or technical studies.

The northern boundary of the Site is formed by the rear garden boundaries of properties along Dalloway Road and Stewarts Rise and allotments. The definition and quality of these boundaries varies and affords some open views into rear gardens, suburbanising the settlement boundary. The housing is not characteristic of the vernacular associated with the historic core of Arundel or the Victorian development experienced upon the approach to the town from Ford Road.

The hedgerow along Ford Road (eastern boundary) is well managed but does not appear to be species rich or contain many hedgerow trees. The boundary would benefit from enhanced species planting to provide improved biodiversity, longevity and filtering of views.

Current access to the Site is obtained via field gateways on Priory Lane along the southern boundary. The condition of the boundary is considered low/moderate varying between large open gaps and gappy hedgerow. The boundary would benefit from enhanced species planting and connectivity along its length to reinstate the field boundary pattern, reinstate the hedged character of Priory Lane and its improve its contribution to the green corridor and habitat network. It will also form part of a wide landscape buffer that will create a native transition between the rural landscape to the south of the lane and the new settlement boundary.

The western boundary is defined by a native hedgerow containing mature hedgerow trees which filter views into the Site from the west. Protection and enhancement of this boundary will also benefit its habitat potential and longevity.

### *Setting of Arundel*

There is a cone of view towards the castle and St Nicolas Church from Ford Road and Priory Lane. These become screened to the west by the mature TPO trees that run through the centre of the Site. Only the eastern extent of the Site is experienced within this view. The current landscape within the view, whilst rural, is not considered a high-quality landscape setting. The allotments and housing south of Maxwell Road are notable features in the background, contrasting with the adjoining rural field. Ford Road, a busy main road into Arundel, also detracts from the rurality of the scene. This view line will be kept clear of development and form part of the informal native public open space. The existing boundaries with Maxwell Road and the allotments will be enhanced to reduce the existing suburban influence. The proposed development to the west of the view will be considered to provide a low density frontage that reflect the higher quality local vernacular.

### *Setting to the SDNP*

The boundary of the SDNP to the west of the Site runs along Tortington Lane and is defined by dense mature Ancient Woodland. Further woodland and tree belts east of the boundary truncates intervisibility between the Site or the wider Arun valley landscape to the east or south. In terms of potential experiences of visitors to the park, the SDNP boundary is not defined and there are no way-markers, information boards or opportunities for parking that emphasise it as a destination. The Site is visible along a limited section of Priory Lane and the local footpath between the lane and Dalloway Road, both of which provide access to the footpaths within the SDNP. Within these views the existing settlement boundary is already a notable feature and in parts a notable detractor. The assessment has concluded that the proposed development will not materially alter the visual setting or expectations of the SDNP. It does however provide an opportunity to positively contribute to additional access and GI links, in particular from the River Arun valley.

## Visual Analysis

Site visits confirmed that opportunities for views towards the Site and potential development were heavily restricted by existing development at Arundel, low lying topography and intervening vegetation within the surrounding landscape.

Views from the north are limited to properties and the allotments immediately adjoining the Site, with limited framed views along High Ridge Close. Views from these properties will be towards a landscape buffer that will form an open space between the proposed active street frontage and the existing settlement boundary.

Views from the south and east are restricted to a 2-2.5km arc due to the low-lying topography and intervening treed field boundaries. Within this arc, views beyond Ford Road and Priory Lane become restricted to predominantly glimpsed winter views. Where such views become available, the current settlement boundary is also visible but is of such a scale in the wider views that it does not detract from the overriding experience of the landscape in the foreground or the elevated focal point of the historic core of Arundel.

Open views towards the development will be available from Ford Road and Priory Road, however the landscape and settlement frontage has been considered to provide a high-quality setting to the town, reflecting a traditional vernacular and destiny appropriate for a settlement/rural edge. Tree planting in and around the development will create a wooded leafy setting and street scene.

Views from the properties along Priory Lane are limited to upperstorey views with gardens views screened by garden boundaries.

The development will not affect views towards the historic core.

Photographs of the potential views from the full range of receptors are included within the LVBA.

Views from the west are limited to a Public Footpath which provides access to Priory Lane and Dalloway Road. The views are heavily filtered by intervening trees with glimpses towards the current settlement boundary. Views further west, including from the SDNP are screened by dense woodland.

## Landscape Strategy

The Strategy and Objectives have derived from the identification of various technical and perceptual constraints. It incorporates the opportunities identified both through assessment but also within the aims and management guidelines set out within the Local Plan, the Arundel Neighbourhood Plan, The Landscape Character Assessments and the Arundel Village Design Statement. The quality and traditional vernacular of the development will continue to be driven by the aspiration of the Norfolk Estate to provide an ongoing legacy to the setting of Arundel.

**Objective 1 – Green Infrastructure** - A strong landscape framework is important for the connectivity of habitats and Green Infrastructure as well as the assimilation of the proposals into the existing settlement. It also provides opportunities to mitigate and enhance effects on the baseline views and experiences. Green corridors along the periphery and through the development will provide opportunities for new access into and through the Site from the town and the River Arun to the SDNP linking existing PRoW.

**Objective 2 - Character and Pattern** - Provide a layout that can be assimilated into the legibility of the existing settlement pattern appearing as a natural extension to the town. Character will form a fundamental aspect of the layout and will reflect the aspirations of the Estate to create a 'legacy' development reflecting a high quality and typically characteristic approach to Arundel.

**Objective 3 - Setting** - Provide a high quality and considered settlement boundary that improves and enhances the current gateway of Arundel and responds to the setting of the SAM to the south of Priory Lane. The development is considered to have a negligible impact upon the current visual and perceptual experiences of the SDNP, however offers potential to improve links into the park from the River Arun.

**Objective 4 - Biodiversity And Habitats** - Protect and enhance all existing key landscape and biodiversity features. Ensure an overall net gain in species diversity, habitat types, biodiversity opportunities as well as improved connectivity and longevity.



Figure 01 - Landscape Strategy

Site Boundary	Existing Roads	Retained views to Arundel & setting to SAM	Potential Green Infrastructure	Potential Open Space
Existing Trees	Existing PRoW	Potential Development Areas	Existing hedgerows to be retained & enhanced within 10-15m wide buffers to allow for public access and protect Bat commuting routes and Dormouse habitat	Potential SUDS to be located outside of flood zone & managed as wetland for wildlife
Existing TPO	Ancient Woodland	Potential Play Area	Proposed Boundary Enhancements	Floodplain Meadow & Ditch Restoration
Existing Watercourse	Scheduled Ancient Monument (SAM)	Potential Allotments	Native species to promote connectivity for Dormice	
			Potential Pedestrian Access	



## TRANSPORT NOTE

Prepared on behalf of Savills

**Date** : April 2019

**Project** : Land at Tortington, Arundel

**Project Ref** : 173482

**Report Ref** : 173482-02

### DOCUMENT CONTROL

REV	ISSUE PURPOSE	AUTHOR	CHECKED	APPROVED	DATE
-	Draft Client Issue	DH	KM	DRAFT	04/04/2019
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*DH*  
*KM*

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## **1.0 INTRODUCTION**

- 1.1 This Transport Note (TN) summarises the findings of initial reviews of transport matters (**ACE Report references: 173480-02 and 173481-01**).
- 1.2 The site is bound by: Ford Road to the southeast; Priory Lane to the southwest and west; and the rear boundaries of existing residential properties fronting onto Stewards Rise and Dalloway Road to the north and northeast.

## **2.0 ACCESS**

- 2.1 **ACE Report Reference 173480-02** considered the potential options for the site to take access from the existing highway network.
- 2.2 It was concluded that there were a range of potential options available, however the preferred option was to provide the main vehicular access from Ford Road by way of a priority "T" junction, plus footway provision in order to serve upgraded bus stops on Ford Road.
- 2.3 The main site access with Ford Road was to be supplemented by an emergency secondary access on the northern boundary of the site that could be utilised by pedestrians and cyclists moving between the site and Dalloway Road, whilst there were further potential options to improve pedestrian connectivity between the site and the existing residential areas to the north.
- 2.4 The preliminary site access proposals also proposed the extension of the existing 30mph speed limit on Ford Road along the site frontage, which was to be supported by new traffic calming measures.
- 2.5 Visibility splays commensurate with the reduced 30mph speed limit are achievable within the adopted highway/Client land ownership.



### **3.0 TRAFFIC SURVEYS**

- 3.1 To help inform the preliminary access design, traffic surveys were commissioned to record existing vehicle speeds and volumes along Ford Road and Dalloway Road.
- 3.2 These measured 85<sup>th</sup> percentile speeds below the respective speed limits of the road upon which the surveys were taken. Since development of the site for residential use would amount to an extension of the existing residential area southwest of the centre of Arundel, it is considered that an extension of the existing 30mph speed limit along Ford Road would be necessary and in keeping with the surrounding area.
- 3.3 Visibility splays based upon the recorded vehicle speeds were reviewed indicating that from a 4.5m setback splays of 117m are required to the left (looking north) and 100m to the right (looking south) and are able to be provided even without a reduction in speed limit along Ford Road.

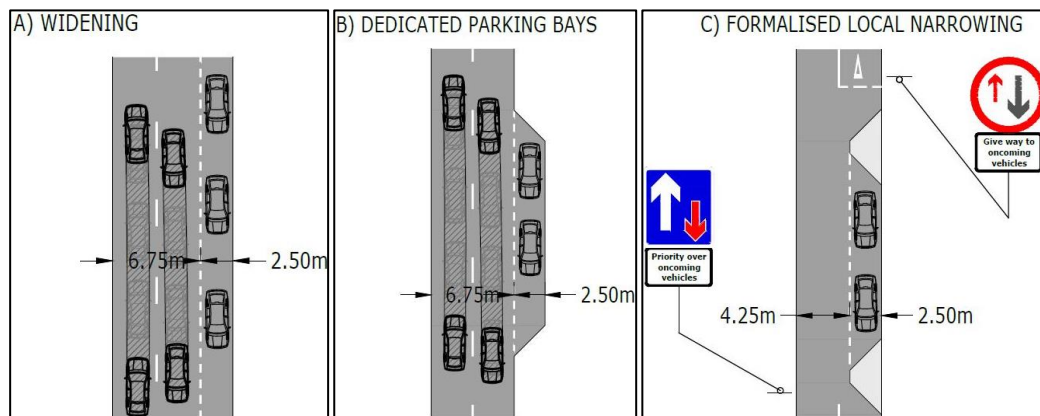
### **4.0 JUNCTION CAPACITY MODELLING**

- 4.1 Junction capacity modelling of the preliminary design has been undertaken during the AM and PM network peak hours as identified from traffic survey information.
- 4.2 The junction capacity modelling indicates that the preliminary junction design would operate with ample spare capacity in a future year scenario of 2028 with the anticipated development traffic for a scheme of 150 dwellings, which was used for sensitivity purposes although the proposals are only for 90 dwellings.

### **5.0 FORD ROAD PARKING REVIEW**

- 5.1 It is understood that there is an element of parking that takes place on both sides of Ford Road that can impact on the operation at peak times.
- 5.2 We considered potential mitigation measures to alleviate these issues and it is considered a combination of some of these could be utilised. A selection of the

potential measures to alleviate existing issues on Ford Road are shown in **Plate 5.1**.



**Plate 5.1: Ford Road Mitigation Options**

- 5.3 Whilst the impact of the site on Ford Road is anticipated to be relatively small, the potential improvements shown above would help to mitigate any impact as well as improve on local conditions.
- 5.4 As part of a package of measures including the new gateway feature proposed as part of the preliminary site access arrangements, this would help to achieve lower vehicle speeds along Ford Road for the benefit of local residents.

## **APPENDIX B:**

### **BLASTREAT/GREENHURST – SWALLOW BREWERY HERITAGE ASSESSMENT**

- Extract from Historic England Advice Report (April 2017)
- Extract from ADC Officer Report on Planning Application AB/36/18/PL stating Conservation Officer comment

## Extract from Historic England Advice Report (April 2017)

Historic England

Advice Report

13 April 2017

### Case Name: Old Swallow Brewery Buildings, Arundel

### Case Number: 1444063

## Background

Historic England has been asked to assess the former Swallow Brewery building at 14 Fitzalan Road, Arundel for listing. This application was prompted by pre-application discussions regarding the redevelopment of the site.

## Asset(s) under Assessment

Facts about the asset(s) can be found in the Annex(es) to this report.

Annex	List Entry Number	Name	Heritage Category	HE Recommendation
1	1445190	14 Fitzalan Road (former Swallow Brewery building)	Listing	Do not add to List

## Visits

Date	Visit Type
17 February 2017	Full inspection

## Context

The building is not located within a conservation area, nor is it locally listed.

## Assessment

### CONSULTATION

The applicant, the owner, the occupier, Arun District Council (as Local Planning Authority) and the West Sussex Historic Environment Record were invited to comment on the factual details of the case as part of the consultation process. The West Sussex HER responded but did not have any further comments to add.

**APPLICANT'S COMMENT:** The applicant responded with a number of comments, wishing for the objective of the Arun Local Plan, in regards to building conservation and archaeological heritage, to be taken into account. They also state that although the buildings in question are just outside of Arundel Conservation Area, that the principles should equally apply in this circumstance. They also cited the recent sympathetic conversion of the Eagle Brewery into housing, whilst retaining much of the brewery buildings.

**HE RESPONSE:** Whilst we are fully aware of both the boundaries of Arundel Conservation Area and the Arun Local Plan, these matters are not relevant to the listing assessment and should be addressed by Arun District Council as part of the planning process. Comparison with the Eagle Brewery is made in the discussion section of this report.

**OWNER'S CONSULTANT COMMENT:** WYG Environment Planning Transport Limited, on behalf of the owner, submitted an independent assessment of the site. This report assesses the building against the key criteria set out in the Principles of Selection for Listing Buildings (DCMS, 2010), and the guidance in the Selection Guide for Industrial Buildings (Historic England, 2011). The report concludes that the site does not meet the statutory criteria for listing.

**HE RESPONSE:** The points raised will be covered in the discussion section of this report.

### DISCUSSION

14 Fitzalan Road is a former ancillary building of the Swallow Brewery, constructed in c1897. Breweries grew rapidly in size from the C18 to meet increased demand and accommodate advances in science and technology. There was a tendency towards integrating a wide range of functions on a single site, with a number of processes integrated vertically in a single building, the tower. The major breweries are often monumental in scale and architectural ambition, but many towns contained one or more that were equally up-to-date, replete with tower, albeit built on a smaller scale. Many are architecturally prominent and contain constructional features of importance.

The Principles of Selection for Listing Buildings (DCMS, 2010) sets out how the Secretary of State determines whether a building is of special interest and merits listing. The key criteria are historic and architectural interest on a national scale. For buildings which post-date 1840, increasing selectivity is applied as their age decreases, reflecting the large numbers that were built and their increasing standardisation. The Historic England Listing Selection Guide for Industrial Buildings (2011) gives further contextual guidance. The key considerations to address when considering industrial buildings for designation are the wider industrial context; regional factors; integrated sites; architecture and process; machinery; technological innovation; rebuilding and repair and historic interest.

14 Fitzalan Road is a relatively late example of a utilitarian industrial building. Even when placed within its broader context, this building is not demonstrative of a particular part of the Swallow Brewery site or the brewery process in general. This is almost all that remains of a once integrated site. There are fragmentary remains on the other side of Fitzalan Road, including the base of a chimney, but nothing substantial exists except for the building in question. The brewery industry in Arundel is already represented on the National Heritage List for England by the former Eagle Brewery (NHLE reference 1263856, listed Grade II). This building invites comparison not only for its use but its architectural interest. The former Eagle Brewery building has distinctive flint construction with red brick dressings and a clerestory roof form, in comparison to the somewhat standard plan and materials evident at 14 Fitzalan Road.

The lack of certainty as to the exact use of the building somewhat hinders further direct comparisons. However, other examples of listed breweries make it clear that the principal brewery building holds most of the special interest. Where subsidiary structures are subject to their own listing, the context of the building is still clearly readable. An example would be the cask store at the Castle Brewery, Newark (NHLE reference 1288308, listed at Grade II). Part of its interest lies in the demonstrable link to the main Castle Brewery building, part of which survives and is listed (NHLE reference 1196096, listed at Grade II). The former Swallow Brewery building is a fragmentary survival on a site where the dominant element, including the tower, has been demolished.

To be considered for listing, an industrial building should normally reflect in its plan form and appearance the specific function it was intended to fulfil. It is unclear what purpose this building had. The internal plan form has altered as the use of the building changed over the C20, and there is no machinery relating to the brewery process which may have enhanced the interest of the site. Although partial rebuilding and repair is often related to the industrial process and can provide evidence for technological change, in this case there is only evidence of multiple changes of use since the brewery closed.

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.

#### CONCLUSION

After examining all the records and other relevant information and having carefully considered the architectural and historic interest of this case, the criteria for listing are not fulfilled, and therefore 14 Fitzalan Road is not recommended for listing.

#### REASONS FOR DESIGNATION DECISION

The former Swallow Brewery building at 14 Fitzalan Road, Arundel, c1897, is not recommended for listing for the following principal reasons:

- \* Architectural interest: built of standard materials to a simple design, the building is typical of its type and date, demonstrating little architectural interest or innovation;
- \* Alteration: internally the building has been subdivided, and no original fixtures or fittings relating to the brewery process remain;
- \* Context: none of the associated brewery buildings survive, obscuring the role and purpose of this building.



## **Extract from ADC Officer Report on Planning Application AB/36/18/PL stating Conservation Officer comment**

### **Conservation Officer - Objection**

Whilst the site is located within the historic town of Arundel, it lies just outside of the conservation area (which was designated in 1975). Development in this location therefore has the potential to affect its setting.

**The existing Building/assets** - There are a number of assets in close proximity to the development site. However, the site itself must also be considered. Whilst the application site has developed over time, as indicated by the variety in age and style of the structures present, one particular building is noted, and has been considered suitable to meet the definition of a heritage asset. In this case a non-designated heritage asset.

The eastern frontage of the (Blastreat) building is an interesting survival of the demolished Swallow Brewery. Although the late 19th century structure does not merit formal Listing, Historic England confirms that it has 'clear local historic interest, as a link to a once major industry and ties to a prominent local family'. So while not formally designated, the frontage building is nevertheless a heritage asset and it makes a strong contribution to townscape character. The Planning Practice Guidance identifies that a non-designated heritage asset should be identified when considering development proposals, such as this one. Further, the building is of local historic interest and it has been considered to comply with the Council's criteria for Local Listing.

In this case, the harm to the significance of the heritage asset is absolute, as the proposal results in its total demolition. Industrial buildings such as this once typified the riverside area and their continual loss diminishes the locally distinctive qualities of the wider townscape.

The other buildings proposed for demolition are of no architectural or historic interest and there is no objection to their loss. However, it is considered from a purely conservation perspective that the eastern frontage building could be rehabilitated and adapted to a sustainable alternative use, with adjacent new development designed to respect and complement it.

In order to ensure that the redevelopment of the site is fully considered, an Article 4 Direction has been confirmed on the eastern part of the building. This removed the permitted development right related to demolition, which requires the property owner or developer to apply for planning permission to demolish.

**The proposed replacement building** - The Design and Access Statement suggests that it would be more appropriate for the design of the proposed building on the north east part of the site, adjacent to the Conservation Area to reflect the utilitarian style and appearance of Victorian brewery architecture (to be demolished) as this would provide a visual reference and association to the former Swallow Brewery that had once occupied the land between Queen Street and that part of Fitzalan Road.

It is noted that the north east block has been designed to reflect a more utilitarian, style of architecture reflective of brewery architecture/design features. Such an approach attempts to respect the setting of the conservation area. However, it is still considered unfortunate that the existing building could not be incorporated into the final scheme. As identified, the building has been altered internally, which provides significant potential for alteration, whilst maintaining and street frontage. This retained element would then provide a starting point for the remainder of the proposed scheme.

## APPENDIX C: Flood zones in Arundel

