

Heritage Statement

Produced by DLBP Ltd in support of the Planning Application 22/01735/FULEIA Crouchlands Farm

Brief summary

For the Parish Council to consider when reviewing the application

The following are relevant current planning policies

CDC Local Plan 2014-2029 Policy 47 Heritage and Design

*.....new development which recognises, respects and enhances the local distinctiveness and character of the area, landscape and heritage assets will be supported. Planning permission will be granted where it can be **demonstrated that all the following criteria have been met and supporting***

guidance followed:

1. The proposal conserves and enhances the special interest and settings of designated and non-designated heritage assets including:

- Monuments, sites and areas of archaeological potential or importance;*
- Listed buildings including buildings or structures forming part of the curtilage of the listed building;*
- Buildings of local importance, including locally listed and positive buildings;*
- Historic buildings or structures/features of local distinctiveness and character;*
- Conservation Areas; and*
- Historic Parks or Gardens, both registered or of local importance and historic landscapes.*

2. Development respects distinctive local character and sensitively contributes to creating places of a high architectural and built quality;

3. Development respects existing designed or natural landscapes; and

4. The individual identity of settlements is maintained, and the integrity of predominantly open and undeveloped character of the area,....., local landmarks and the South Downs National Park, is not undermined.

National Planning Policy Framework (NPPF)

195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

197. In determining applications, local planning authorities should take account of:

(c) the desirability of new development making a positive contribution to local character and distinctiveness.

Considering potential impacts

199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

201. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Brief Summary of Findings

1. The report limits consideration of heritage to 5 Grade II Listed buildings in close proximity to the proposed development and the Plaistow Conservation Area(CA). It does not consider the impact on the wider area containing listed buildings nor on the historic landscape.
2. The report dismisses impact to Listed and non -designated heritage assets and the CA from increases to road traffic and changes to road access. If the Parish Council, having obtained their own professional advice on the matter, consider there is a greater volume of traffic to the surrounding roads , then the Applicant should be requested to reappraise the Heritage Statement to take into consideration the impact of increased traffic movements in the area.
3. The report fails to sufficiently interrogate the adverse impact on setting to Grade II listed buildings . in particular Crouchlands House , Lanelands and Nuthurst and the historic landscape., which are in the immediate vicinity of the proposed development.
4. The report does not define what our local vernacular is and then states that the proposed development is acceptable and has low impact on heritage assets because the design reflects the local vernacular.
5. The report has insufficient consideration for impact of noise, light and smell to the setting of the heritage assets.
6. The report states that impact can be mitigated by tree planting. This is not regarded as suitable mitigation to make a poorly designed and located development acceptable. The trees should be deciduous, to reflect the surrounding countryside , therefore in winter months leaf coverage will not screen the development. And there will be greater use of artificial light.
7. Crouchlands House is one of the premiere listed Buildings in the Parish and the Report does recognise its status and the importance of its wider setting. But the impact of the proposed development has been dismissed as being part of normal changes to farming, which the house has witnessed through the centuries. There is no recognition that the size and scale of development in close proximity to the House goes well beyond that of a normal dairy or livestock farm, even allowing for some subservient diversification to support the farm , as is now modern practice

Overall it is considered that the Heritage Report fails to identify all the heritage assets or to consider fully the impact on the historic landscape . It fails to sufficiently consider the impact of the extremely large scale development, which goes beyond normal farm diversification, on the historic assets and the historic landscape.

There is no evidence that the proposed development has been designed to respect and enhance the historic assets and landscape. The heritage report is reactive to the design scheme rather than being shown to have influenced design decision making. In doing so the proposed development can not demonstrate it recognises, respects and enhances the local distinctiveness and character of the area, landscape and heritage assets in line with Policy 47 CDC Local Plan.

The Heritage report seeks to down play any impact and draws conclusions of 'less than substantial harm' or 'no harm' in order to attempt to meet the NPPF.

Detailed comments/areas requiring further information / questions to raise with CDC planning officer – to include document and page references if appropriate. Please draw out specific questions/queries to be drawn to the full Council and planning officer's attention.

Issue 1 Consideration of the Heritage Assets is limited and findings are totally reliant on the other reports in the application.

The Heritage Statement produced by DLBP Ltd. in support of the application identifies only 2 Grade II listed buildings close to the development site, Crouchlands House and Lanelands and 3 others Nuthurst, Little Flitchings and The Old House in Rickmans Lane. It also considers the Conservation Area of Plaistow. In summary the conclusion is that the buildings identified will suffer 'less than substantial harm' or 'no harm'. The Conservation Area (CA) and the 30 Grade II buildings in Plaistow will suffer 'no harm', due to the separation of the development from the CA.

The Heritage Statement does not identify other heritage assets in the wider area which may be impacted, such as those on the surrounding highways and there is no assessment of the significance these assets.

The heritage statement reproduces a number of historic maps but makes little reference to the value and significance of the Historic landscape.

The Heritage Statement relies wholly on other documents in the application and reiterates the conclusions within these documents, such as the Planning Statement, Transport Assessment, and Lighting Assessment without specific further interrogation or analysis of the impact on heritage both for the buildings and the landscape in which these buildings are set. Therefore if the PC find that other supporting documents are not considered accurate this would immediately call into question the findings of the Heritage Assessment.

Issue 2

Traffic and the Historic Environment

The Heritage Statement does not consider the impact of traffic movements on those historic buildings identified or on the CA and the Grade II listed buildings in Plaistow. Nor does it identify historic assets in the wider geography and the access highway network. So that Grade II Listed buildings in Foxbridge Lane, Foxbridge Farmhouse and Plaistow Road Ifold, Keepers Cottage, and the Grade II listed buildings on the route through Kirdford, and the Kirdford Conservation Area are not identified, assessed and considered in relation to the development.

The proposed development must in its size and the nature of the development and its location be considered as a 'destination' development requiring both a large work force and a site user to travel into the development from the wider area of Chichester, Horsham, Waverley District, and Guildford Borough and the South East region. This volume of traffic is underlined by the amount of car, coach and lorry parking provision on site.

Increased traffic movements both cars and HGV will change the historic environment, with additional road noise, vibration and a significant change to the relative quiet historic country lanes and roads through the villages. The significantly increased vehicle movements on site and to the site and carparking on site will change the setting of the Historic buildings and the CA.

The report dismisses vehicle impact on the basis that these are roads in use anyway. However much of the traffic in the area is generated by local movement especially for Rickmans Lane and Foxbridge Lane. With very little through traffic mainly limited to Plaistow and Loxwood Road. The report has not recognised the day to day increases and the Event increases in traffic created by the proposed development being a 'destination development'. In particular this would be most noticeable at weekends, when the surrounding villages and particularly Plaistow and Kirdford are at their most quiet and tranquil, reflecting their historic setting.

The Parish Council should have consideration as to whether, in their opinion, having obtained professional advice on traffic and transport the application has sufficient regard to the level of impact on the Historic Environment in general and on specific historic building assets and whether all the assets have been identified.

Note : The adverse impact of traffic movement was specifically recognised in the Appeal Decision for Crouchland Farm Biogas development
Appeal A: APP/L3815/C/15/3133236 Appeal B: APP/L3815/C/15/3133237

Issue 3

Historic Landscape , field patterns , historic PROW and road access

There is little to no assessment or consideration of the impact of the development on these matters :-

- Although historic maps are listed in the heritage documents they are not used in relation to historic field patterns. This section overlaps with the landscape assessment and is probably best dealt with under Landscape.
- The development will significantly alter the 'setting' of the PROW on site , particularly the ancient drovers routes running through Crouchland farm land and adjacent to the proposed development. The experience of users of these historic routes will change significantly from a quiet tranquil rural route, little altered over the centuries from which the historic patterns of use and development can be appreciated and understood. And on which there are few other pedestrians or vehicle movements, the route passing the contained modern farmyard and historic houses. This will change to that of routes dominated by large scale and extensive commercial and retail out let and equestrian development together with potentially 80+ holiday makers and wedding guests also on site. With numerous vehicle and pedestrian movements, carparking, noise, smells, and lighting.
- The increased volumes of traffic identified in the documents generated by the proposed scheme will significantly alter the quiet country lanes and the relatively quiet village roads through Plaistow and Kirdford.
- The new site access will alter the road layout at Streeters Farm, a non designated heritage asset and remove historic hedging and create a large intrusive road net work into the farm. Together with increased vehicle movements through the farm site , not related to farming.

Issue 4

Consideration of the specific historic assets identified in the Heritage statement

Crouchlands House

The statement does provide an accurate historical description of the asset and recognises at **para 79** the largely unchanged wider setting in which the former Farmhouse sits. Recognising at **para. 85** that the house sits in an agricultural landscape. But in considering the impact of the proposed development it has insufficient regard to:

- a) The proximity of the largest section of the development, the equestrian unit together with the retail and food outlets. The mass and bulk of the equestrian development has not been sufficiently considered. This is an Olympic size indoor and outdoor arena less than 150m from the house. There are no cross sections of the site to understand the impact.
- b) The Equestrian building is stated in **para. 82** as being in the local vernacular reducing the impact. However this building is a very large modern structure with large low pitched metal roof and bears no similarity to the local vernacular of plain clay tile, brick and timber. The local vernacular is not described in the document.
- c) The access to the house will be through the 'urban' development of the retail, agri-tech buildings, carparking and coach parking. Significantly different to the current access. **Para 84** identifies the significant change to the access but does not engage with the impact.
- d) At **para 83**, the report considers the impact of the agri-tech and glamping to be neutral on the House, but again traffic movements through the site, carparking, numbers of people on site, noise and lighting associated with these uses is not considered.
- e) Overflow car parking for the equestrian development is set along the PROW immediately adjacent to Crouchland house boundary.
- f) Noise, smell and lighting from the proposed development is mentioned but not specifically assessed in this document for Crouchland House. The size of the Equestrian development and its operational use must be considered and its level of impact on the setting of Crouchlands House.
- g) The experience from the PROW, the historic north south route Kirdford to Plaistow, both of the route and of Crouchlands House setting will be adversely impacted. Viewers - pedestrians, cyclists and horse riders will be conscious of the significant difference between the historic house and the huge scale of development adjacent.

The Heritage statement fails to analyse these aspects. Instead it refers to remediation of the farm and diversification as justification for the development. And that the adverse impact can be mitigated by tree planting and regrading, **para 82**. However no reference is made to tree type and unless evergreen (which is not suitable in this landscape) would leave Crouchlands House with clear views through to the development in winter. Tree size may take many years to screen the development from Crouchland House. In winter months there will be greater and longer periods of artificial light usage, not screened by the planted trees.

The Heritage Statement conclusion is that the effect on Crouchlands House is 'less than substantial harm' and the proposed development is dismissed as being part of the on going change in agriculture that Crouchland House has experienced through the centuries. However the PC need to consider whether such a comment gives sufficient consideration to the size and scale of the proposal and the fact that much of the proposed development does not require a countryside setting nor is it subservient to the main farming operation.

Lanelands

Similar comments apply as to Crouchlands above. The setting of Lanelands is identified, despite changes in landownership and use, as historically consistent -woodland interspersed with irregular fields located on the same ancient North-South route as Crouchlands. **Para 95.**

The Heritage statement does identify that the view from the house will be impacted by the roofscape of the equestrian development and that there will be an impact from lighting the new development. Thus adversely impacting the setting.

But the report again refers to the buildings reflecting the local vernacular (**para 98**) and to tree planting reducing any impact. But, as for Crouchlands House, comments regarding the fact that the local vernacular is not identified or described and the development is plainly not in a local vernacular apply equally.

The document states that there will be no light spill reaching Lanelands, **para 99.** But use of the arena and car parking will be lit at night and must generate light in an area where currently there is none. Noise is not mentioned but the equestrian development use must generate noise, again currently where there is little or none. The equestrian development will operate 24/7.

Nuthurst , Little Flitchings and Old House

The proposed development is considered in terms of highway impact , noise and light . All are considered to have a neutral impact.

Highway impact should be considered in light of the advise the PC receive. Increase in vehicle movements and in particular HGV will impact the setting of these assets, particularly Nuthurst and Old house which are situated close to the road.

Light and noise is considered to be mitigated. However there is no consideration of the impact on Nuthurst and its setting. Nuthurst, although adjacent to Rickmans Lane, is set in a rural area, it sits on higher ground overlooking fields to Crouchlands farm yard. The views and setting is quiet rural fields and trees with the compact modern agricultural buildings. Accordingly it will have clear views of the development which is not recognised in the Heritage Statement. The large additional structures proposed will be visible changing the experience and setting from Nuthurst. Noise both day and night from the proposed development will channel up the valley to Nuthurst. Such uses as the glamping and use of Harnips Barn will result in noise levels and light in both a quiet and dark countryside setting. Screening by tree planting will not obscure such changes

Plaistow Village Conservation Area (CA)

The statement considers there would be no impact from the development due to its distance away from the CA. Traffic generation and noise is dismissed because vehicles accessing the development will use the existing highway. . The PC will need to determine if this is a correct and realistic finding using the highway and transport report from their professional advisors.

There is no consideration of any increase in movements generated by the proposed development. However it is considered that traffic movement increases, identified not only in the application Transport Assessment but from the PC appointed professional, through the village will alter the generally quiet tranquil setting of the CA and its historic Listed and non- designated heritage assets. Plaistow currently has little through traffic especially to Rickmans Lane. Traffic is currently generated by immediate local movement. But for the proposal to be commercially successful it must become a regional destination. There is no suitable public transport and access will be by car, HGV and coaches.

Issue 5

Non -heritage Assets and the impact of the scheme

The report identifies some adjacent non heritage assets

Hardnips Barn

Hardnips Barn has been significantly altered through recent redevelopment to residential unit and so the change of use to a café/bar is likely to have limited impact on the structure. But such use will impact on the very quiet and dark rural area, generating noise and light impacting on the historic landscape and historic assets such as Nuthurst, detailed above. It will also change the setting of this non heritage asset from a former quiet barn and then residence to a hub of activity within a very rural woodland and field setting.

It is accepted that other sites identified, including historic glass workings, limekilns and quarry are not included or necessarily impacted provided public access is restricted to these areas.

Streeters Farm and Redlands

The report recognises that there has been little change to the historic setting, settlement and fieldscape pattern, relating to these properties.

It states that the proposed development will preserve and strengthen the agricultural use. But as none of the development is agricultural use, being industrial, office, retail and equestrian and its size and scale is beyond normal levels of agricultural diversification. The agricultural use is subsumed by the proposed development. This has far reaching ramifications for the little changed historic landscape and the setting of both listed and non heritage assets.

Access changes will have a severe impact on Streeters Farm and its setting. The access is larger in width than Rickmans Lane, creating an anomaly in this quiet rural hedge bound country lane. Increased traffic movements will create noise and light directly opposite the buildings. This has not been fully addressed in the report

Redlands Farm will experience noise and light in an area where there is currently little. This alters its setting, as for other properties

Issue 6

Heritage Assets Not identified

The Heritage statement has not recognised any changes to the wider area along access roads particularly Foxbridge lane , Plaistow road Ifold and Plaistow Road Kirdford. There are Grade II Listed Buildings fronting these roads and they will be adversely effected by increased traffic levels. This is particularly the case for Foxbridge Farmhouse Foxbridge Lane. Currently Foxbridge Lane is a narrow country lane serving local traffic. With the current proposal it will become the major access route into the development with vehicles arriving from a large regional area. Therefore the Farmhouse will suffer additional noise, vibration and disturbance and the lane will cease to be a quiet route and the setting will be altered. The Heritage Report is based on the Applicants transport assessment . If the Parish Council, having obtained their own professional advice on the matter, consider there is a greater volume of traffic to the surrounding roads , then the Applicant should be requested to reappraise the Heritage Statement to take into consideration the impact of increased traffic movements in the area.

The importance and adverse effect of traffic movements is held in the Appeal Decision for Crouchland biogas ref: Appeal A: APP/L3815/C/15/3133236 Appeal B: APP/L3815/C/15/3133237