

<p>Title of theme that you are commenting on</p> <p>Foxbridge Golf Course proposed re-development for Leisure village</p> <p>Heritage</p>
<p>Brief summary</p> <p>For the Parish Council to consider when reviewing the application</p> <p>The following are relevant current planning policies</p> <p>CDC Local Plan 2014-2029 Policy 47 Heritage and Design <i>.....and 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:</i></p> <ol style="list-style-type: none"> 1. <i>The proposal conserves and enhances the special interest and settings of designated and non-designated heritage assets including:</i> <ul style="list-style-type: none"> - <i>Monuments, sites and areas of archaeological potential or importance;</i> - <i>Listed buildings including buildings or structures forming part of the curtilage of the listed building;</i> - <i>Buildings of local importance, including locally listed and positive buildings;</i> - <i>Historic buildings or structures/features of local distinctiveness and character;</i> - <i>Conservation Areas; and</i> - <i>Historic Parks or Gardens, both registered or of local importance and historic landscapes.</i> 2. <i>Development respects distinctive local character and sensitively contributes to creating places of a high architectural and built quality;</i> 3. <i>Development respects existing designed or natural landscapes; and</i> 4. <i>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.</i> <p>National Planning Policy Framework (NPPF)</p> <p>195. <i>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.</i></p> <p>197. <i>In determining applications, local planning authorities should take account of:</i></p> <p><i>(c) the desirability of new development making a positive contribution to local character and distinctiveness.</i></p> <p>Considering potential impacts</p> <p>199. <i>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.</i></p>

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.*

In Summary

The Heritage Assessment produced to support the application fails on the following grounds:

- **It fails to identify all the designated heritage assets which will be affected by the development.**
- **It fails to consider the impact of the proposed scheme on the historic landscape**
- **It fails to successfully identify the full historic relevance of the closest Grade II Listed building, Foxbridge Farmhouse, and its historic and current setting. It then fails to fully assess the impact of the proposed scheme in terms of its size, traffic generation, noise and light on the Farmhouse.**
- **It fails to consider the impact on the historic village of Plaistow, the Conservation area and the 30 Grade II Listed buildings from this proposed development which is larger in scale than the village itself. By its sheer size it will generate a significant increase in built form and numbers of people 'living' in the parish, and will generate significant increase in traffic movements, noise and light.**

In failing to adequately assess and consider the historic environment the proposed scheme has consequently failed to make any positive contribution and the harm generated by the scheme would far outweigh any benefit. There is no evidence that the proposed development has been designed to respect and enhance the historic assets and landscape. The proposed development can not demonstrate it recognises, respects and enhances the local distinctiveness and character of the area, landscape and heritage assets.

Accordingly the proposed scheme on all counts fails to meet Policy 47 of the CDC local Plan and the NPPF paragraphs 195, 197, 199 and 201

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 Identification of the Local Heritage and the wider impact of the Scheme.

The report limits consideration of local heritage to just two grade II dwellings and 1 Schedule monument. The report does not consider the size of the development at 121 living units and 50 bed spa facility and restaurant and farm shop and the potential to impact a wider area than just immediate neighbouring buildings. It does not consider impact on the historic landscape in which the designated heritage assets are situated. Nor does it consider impact on the historic village of Plaistow and the conservation area. Therefore this calls into question the findings of the Heritage Assessment.

The Heritage Appraisal produced by HCUK group in support of the application identifies only 2 Grade II listed buildings; those closest to the development site, Foxbridge Farmhouse opposite the site and Costrong Farm house 450m from the site. It also identifies the scheduled monument Wephurst Glass House to the south east. But it fails to identify Keepers Cottage Plaistow Road Ifold, Grade II Listed, also within 450 m of the site.

It does not consider the wider impact on the Conservation Area of Plaistow and the 30 Grade II Listed buildings in Plaistow village . The report identifies no non-heritage assets of which there are several in Plaistow village. And there is no consideration of the historic landscape in which the designated heritage asset and the conservation Area and village are situated.

The Heritage appraisal does not consider the traffic generation , the changes proposed to Foxbridge Lane and the light and noise generation from such a large development. Without specific further analysis of these matters the impact on heritage, both for the buildings and the landscape in which these buildings are set, has not been adequately assessed. Therefore this calls into question the findings of the Heritage Assessment.

The proposed scheme has the potential to house 816 people. This is far more than the whole population of Plaistow Durfoldwood and Shillinglee. The majority will access the site by car and will take numerous trips out to local attractions resulting in a significant increase in vehicle movements in and around the area. This will impact on the quiet country lanes. It will create noise and additional light on site, where it is currently very quiet and dark.

The scheme creates a new holiday village in the countryside which is historically of small dispersed villages and farmsteads set in small fields bounded by field hedging , ancient assarts and woodland. It will therefore detract from the historic landscape and there has been no attempt to engage with what constitutes the historic landscape to inform the proposed development. Although only an outline application the information presented in the documents shows no regard for the historic landscape or historic vernacular form in this Parish. The proposed scheme is fundamentally urban its form and layout.

Issue 2

Traffic and the Historic Environment

The site is a destination site generating substantial additional traffic, particularly in Foxbridge Lane and Plaistow Road Ifold but also through Plaistow village. The Heritage appraisal does not consider impact of traffic movement on any heritage asset and their setting.

The proposed development must by the nature of the development and its location be considered as a 'destination' development, requiring numerous vehicle movements. It is also a very large development , with 816 people resident on site, plus a Spa, plus visitors to the site to use the facilities provided and a large work force on site of 114. This volume of traffic is underlined by the amount of car parking provision on site. The site will also generate service vehicles including HGV.

The Heritage Appraisal does not consider the impact of traffic movements on those historic buildings identified. Nor does it identify the Plaistow CA or other historic assets in the wider geography and the access highway network.

Keepers Cottage in Plaistow Road Ifold , the grade II listed buildings on the route through Plaistow Conservation Area are not identified , assessed and considered in relation to the development.

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

The proposal requires the widening of Foxbridge Lane, provision of formal passing places, additional signage, and the need to cut back vegetation to create sight lines down the road. This will change the quality of the road from a modest quiet country lane, which originally just served Foxbridge Farmstead. In doing so it will particularly impact Foxbridge Farm House and its setting. There has been no consideration of this matter in the report.

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 from traffic generation and road 'improvements' on the Historic Environment in general and on specific historic building assets and whether all the assets have been identified.

Issue 3

Consideration of the specific historic assets identified in the Heritage Appraisal

Costrong Farmhouse

The Appraisal dismisses Costrong Farmhouse as being too far away to suffer any impact to its setting.

The development is large with a substantial number of buildings and structures on site, large car parks, sports facilities with hard landscaping, over the entire 65 acres and this is only 450m from the Farmhouse. Currently the farmhouse is set in a rural landscape which supports its historic purpose as a farmstead. The surroundings are a very quiet tranquil rural setting and essentially dark at night time. The existing golf course is in itself limited to soft landscaping with minimal built form. Therefore there is a substantial change with the extent of development across the site. The use of the site will generate noise and light and additional traffic movements to and from the site on the kirdford road, running past the building.

The noise base line report produced by Lustre for the applicant identifies at Para 2.3 that '*the main and constant noise on site is bird song and rustling leaves*', with occasional aircraft flyover and road traffic 'noise'. The site is tranquil. The development will substantially change that environment, with in the order of 1000 people on site, holidaying, playing sports, football, tennis, socialising and working and with associated vehicle movements. This noise will change the historic rural environment in which the farmhouse is set.

The site is currently dark at night with no lights. Even though it is stated external lighting will be controlled there will be light emanating from the site and from the many holiday residential units and the restaurant. The examples of the proposed units show substantial glazing and the tents will also be lit inside and there will be substantial light spill from 121 units and a 50 bed hotel and the restaurant. Diners will require lighting to see to eat, if seated outside. This again will substantially change the environment, which is historically very dark. It is noted that the lighting assessment of the scheme will downgrade the site from E1 to E2.

Issue 4

Foxbridge House

The Appraisal does provide basic details of the listing. But it does not establish the historic importance of the farmstead or what constitutes the setting in which the farmstead sits. Therefore it can not determine there is no adverse impact.

The appraisal does not detail the setting, it shows no evidence of its setting, no photographic evidence, just one photograph to the side of the dwelling and no historic mapping of the area. The only comment is at para 3.3' *Its surroundings, on both sides of Foxbridge Road, contribute to an understanding of its form, appearance and contribution to the historic environment*'. [my emphasis]. Here the Appraisal does recognise both sides of the road contribute but then does not engage with the large size of the development, which is immediately to the other side of Foxbridge Lane, and the resultant impact.

The appraisal concludes that the effect of the proposed development on the Farmhouse is Nil but there is no examination of the size of the development.

The Appraisal does not recognise the size of the development across the whole 65 acre site with 121 residential units and a 50 bed hotel plus restaurant and farm shop. Accordingly significant changes to the immediate surroundings to the house and the landscape in which it sits are dismissed. The extensive carparking is likely to be visible from the farmhouse itself. The adjacent farmland remains as does the original farmstead buildings situated across the road. The golf clubhouse and use of part of the land as a golf course has eroded some of the setting but even so this former use was relatively low level with little built form and as an 8 hole course had limited membership and use. The proposed development will substantially change the setting around the listed house.

Road traffic impact is not recognised by the Appraisal. The development is a very large destination venue with substantial increases in vehicle movements, changing the quiet rural quality of Foxbridge lane, undermining the farmstead setting with vehicle noise and vibration. It would appear from the transport report that the informal passing bay immediately in front of the farm house will be formalised creating additional noise disturbance and vibration. Traffic movement was identified in the Bio gas Appeal Decision (ref: Appeal A: APP/L3815/C/15/3133236 Appeal B: APP/L3815/C/15/3133237) as having significant impact.

The appraisal does not recognise any change in noise levels. Currently tranquillity contributes significantly to the setting of the Farmhouse.

The report on noise prepared by Lustre for the applicant states at paragraph 2.2 *Given the rural setting of the site and its surroundings, the noise environment is, as expected, tranquil.* and at para 2.3 *The main and constant source of sound at the time of the site visits was birdsong and rustling leaves. Occasional noise from aircraft flyovers, traffic on Foxbridge Lane and livestock was also noted. Very distant and faint traffic noise was also audible at times.* The report also determines that daytime and night time noise levels remain very similar, underlining the constant level of tranquillity. This environment will radically change for Foxbridge Farmhouse in such close proximity to the development. The property is particularly close to the restaurant and shop facility and carparking. Adding to the increased noise level from car movements, goods deliveries, and site users which will run late into the evening.

The appraisal does not recognise any change in artificial light levels. Currently dark skies contributes significantly to the setting of the Farmhouse. As reported above the development will require external artificial light, to light carparks, roads and pathways and for outdoor leisure activities and dining. The individual units will have internal lighting with light spill further increasing light levels on site.

Issue 5

Keepers Cottage Plaistow Road Ifold

This grade II property is as close to the site as Costrong Farmhouse but has not been identified by the appraisal.

The adverse impact will be similar to Costrong Farmhouse and similar comments apply. Plaistow road is a busier road and so the traffic impact will be less.

Issue 6

Plaistow village and Conservation Area

The Appraisal does not recognise the size of the development and that it is larger than the historic village, both physically and by the number of people on site. Accordingly it will change the historic landscape in which this historic settlement sits. The area is primarily a rural landscape of ancient field patterns interspersed with woods, assarts and hedges with very limited new development with most centred within the Ifold settlement. The area is one primarily of dispersed historic villages and farmsteads. A 65acre development will form a significant change, disrupting the historic landscape and the wider setting of the historic village. And creating a modern urban styled village. By not engaging with what constitutes the historic village and the historic landscape the proposed scheme has not shown any appropriate design response.

There is no consideration of any increase in traffic movements generated by the proposed development through the village and the Conservation area. The PC will need to determine if this is a correct and realistic finding using the highway and transport report from their professional advisors

Issue 7

The Scheduled Monument, Wephurst Glasshouse, is unlikely to be impacted by the development located in woodland away from the development and at ground level and away from any public rights of access. Provided there is no increased access to the ancient woodland there should be no adverse impact and therefore the conclusion of the Heritage appraisal in this respect is accepted.