Land at Downlands Farm, Uckfield

Proof of Evidence of:
Edmund Stratford
BA (Hons), MCIfA

In respect of:
Rebuttal of Heritage Matters Raised by Vivienne Blandford (On Behalf of the Downland Action Group)

On behalf of:
Gleeson Land and John Alison Land and Research Ltd

PINS Ref
APP/C1435/W/23/3321978

LPA Ref
WD/2022/1637/MEA

October 2023
Report Reference
edp6170_r012a

Document Control

DOCUMENT INFORMATION

Client	Gleeson Land and John Alison Land and Research Ltd
Report Title	Rebuttal Proof of Evidence of Edmund Stratford in respect of Heritage Matters Raised by Vivienne Blandford
Document Reference	edp6170_r012a

VERSION INFORMATION

	Author	**Formatted**	**Peer Review**	**Proofed by/Date**
012	ESt	NHa	NPR	FJe 101023
012a	Est	-	-	SCh 121023

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Section 1
Background and Introduction

BACKGROUND

1.1 My name is Edmund Stratford. My qualifications and experience are set out in my Proof of Evidence.

1.2 The evidence which I have prepared and provided for this appeal is true; it has been prepared and is given in accordance with the guidance of my professional institution; and I confirm that the opinions expressed are my true and professional opinions.

INTRODUCTION

1.3 This short Rebuttal Proof of Evidence addresses a number of points raised in the Proof of Evidence of Vivienne Blandford (on behalf of the Downlands Action Group).

1.4 The rebuttal does not cover every point raised in Ms Blandford's proof of evidence, and my not referencing each point below should not be taken to necessarily indicate my agreement with either Ms Blandford's approach, analysis or findings.

1.5 The summary of Ms Blandford's evidence states that its purpose is to provide an 'abbreviated history' of Lake Wood before setting out concerns in respect of the impact of the appeal proposals on Lake Wood.

1.6 I therefore provide a response in respect of heritage matters and where Ms Blandford's evidence extends to make comment on the heritage assessments submitted by the appellant in support of the planning application.

Section 2
Rebuttal of Ms Blandford's Proof of Evidence

MS BLANDFORD'S ASSESSMENT OF PERCEIVED IMPACTS

2.1 The summary at page 2 of Ms Blandford's evidence asserts that the impact of the appeal proposals on Lake Wood, in terms of heritage matters, would arise as follows:

"Increased footfall would also have a damaging impact on the managed natural and historic fabric of Lake Wood. It may also have impact on the buried and fragile archaeology of the Mesolithic."

2.2 Ms Blandford's conclusions on page 14 reiterate this assertion:

"It is the threat from adjacent development that causes concern with the inevitable increased footfall and changes to its immediate surrounding landscapes and the ecological and hydrological damage that will occur. The final part of the carriage drive from the Downlands development is still extant and open and ingress from the development into Lake Wood would be easy."

2.3 However, I find no evidence within Ms Blandford's Proof of Evidence that either quantifies the 'increased footfall' arising from the appeal proposals or sets out how increased footfall within the woodland would adversely impact any element of Lake Wood that might reasonably be considered to comprise its 'historic fabric'.

2.4 Further, Ms Blandford's unevidenced assertion that the appeal proposals would adversely affect the 'historic fabric' of Lake Wood through 'increased footfall' does not take account of the following:

- Lake Wood has public open access; The Woodland Trust actively encourages the use of Lake Wood by visitors and there is a management plan in place to appropriately deal with visitor pressures;
- The appeal proposals would provide for a fence on the appeal site's southern boundary with Lake Wood, which would prohibit direct access to Lake Wood from the appeal site and block informal routes on this boundary; and
- The appeal proposals would deliver a Suitable Alternative Natural Greenspace (SANG), a purpose-built destination for the use of new and existing local residents, providing recreational opportunities on-site to limit any effects on off-site destinations.

2.5 I have therefore considered Ms Blandford's evidence and whether there is any justification for considering potential impacts of the appeal proposals on Lake Wood in the manner alleged and this does not alter the views I expressed in my original Proof of Evidence; i.e. that the implementation of the appeal proposals would result in no loss or harm to the heritage significance of Lake Wood.

MATTERS RELATING TO THE HISTORICAL ROUTE BETWEEN THE APPEAL SITE AND LAKE WOOD

2.6 Ms Blandford's evidence addresses the historical route between the appeal site and Lake Wood and asserts:

"The lidar images shows that the carriageway still exists and can be seen on the lidar images just to the west of the red arrows, contrary to what is stated in the Downlands Heritage Addendum (1.76): 'No trace of any track or route through this woodland on the western boundary of the site was observed during the site visit'. It can be found on the ground, within the woodland, sometimes as a raised embankment, sometimes as a flattened 'road surface' on the extreme western edge of the development site and as a hollow way exiting from Lake Wood."

2.7 Ms Blandford's assertion that '*the carriageway still exists'* is not an accurate reflection of the situation on the ground, not least because the Uckfield Bypass bisects its former alignment to the north of the appeal site. While Ms Blandford asserts that disarticulated fragments potentially relating to the former track may be discerned within limited parts of the appeal site, overgrown by woodland, the evidence presented by Ms Blandford simply does not indicate the survival of a carriageway within the appeal site. There is no navigable track or carriageway extant or maintained between the appeal site and Lake Wood on the alignment of the former 'carriageway'.

2.8 As paragraph 3.210 of my Proof of Evidence sets out in respect of the 'carriageway' between the appeal site and Lake Wood, "*the historical route between them has long since been defunct and is now indistinguishable on the ground."*

2.9 Therefore, Ms Blanford's evidence in this respect does not alter the views expressed in my original Proof of Evidence in terms of the contribution of the appeal site to the heritage interest of Lake Wood or the impacts of the appeal proposals on Lake Wood.

MATTERS RELATING TO THE CONNECTIONS FROM LAKE WOOD UNDER ROCKS ROAD TO BUCKSWOOD GRANGE

2.10 Ms Blandford's evidence addresses the historical routes beneath Rocks Road that connected Lake Wood and Buckswood Grange and identifies:

"A tunnel was cut through these rock outcrops to Lake Wood which still exists today and can be used by residents of Buckswood Grange. This proves there is still an active connection between what was the Streatfield House and the residences today. This is contrary to that which is stated in the Downland Heritage Addendum, Jan 2023, which states:' Nonetheless, it is clear that it now survives as an isolated remnant of the wider grounds of The Rocks, and there is no longer any direct connectivity with the former mansion house to the south of Rocks Road'. In fact, it remains as it was designed, somewhat hidden and secretive."

2.11 My evidence presents the results of my site visits, where I found that access through the tunnels was barred.

2.12 Nonetheless, the conclusions of my evidence, either in respect of Lake Wood or Buckswood Grange, do not rely on the matter of whether the tunnels or accesses under Rocks Road remain open or blocked; the arrangement of the historical routes between Lake Wood and Buckswood Grange under Rocks Road fall outside of the appeal site and would be entirely unaffected by the appeal proposals.

2.13 Therefore, once more, Ms Blanford's evidence in this respect does not alter the views expressed in my original Proof of Evidence in terms of the contribution of the appeal site to the heritage interest of Lake Wood or Buckswood Grange, or the impacts of the appeal proposals.

CONCLUSIONS

2.14 In conclusion, I have considered Ms Blandford's evidence and this does not alter the views I expressed in my original Proof of Evidence.

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