Land at Downlands Farm, Uckfield

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

In respect of:
Rebuttal of Heritage Proof of Evidence of Heather Hall

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

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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 Rebuttal Proof of Evidence addresses a number of points raised in the Heritage Proof of Evidence of Heather Hall, on behalf of Wealden District Council (the Council).

1.4 The rebuttal does not cover every point raised in Ms Hall's Proof of Evidence, as my own Proof of Evidence sets out my full and proportionate assessment of relevant heritage assets, and other matters raised in Ms Hall's evidence can be adequately addressed through oral evidence. My not referencing any point below should therefore not be taken to necessarily indicate my agreement with either Ms Hall's approach, analysis or findings.

Section 2
Rebuttal of Ms Hall's Proof of Evidence

BUCKSWOOD GRANGE

2.1 At 5.17 and 5.18 Ms Hall asserts that the Buckswood Grange listed building derives significance from its association with the Streatfield family and '*through wider estate associations',* and at 5.21 states:

"Buckswood Grange draws significance from the relationship with parts of its setting which include Lake Wood, Fir Tree Grove and Chicory Cottage by virtue of their legible character and tangible historic connections through similar designed landscape features and through the living memory of the Streatfeild family."

2.2 These assertions are unjustified in respect of the appeal site; Ms Hall provides no evidence to demonstrate the legibility of any historical association between the appeal site and Buckswood Grange when experiencing either the Buckswood Grange listed building itself, nor when within the appeal site, either at Chicory Cottage, Fir Tree Grove or the wider appeal site to the north. To be clear, Ms Hall's evidence identifies no relevant "experience" of Buckswood Grange itself within any part of the appeal site, such that any historical, social and economic connections can be understood or appreciated.

2.3 In this way, Ms Hall's evidence overplays the contribution of historical, social and economic connections of the Streatfield estate to the significance of Buckswood Grange and similarly the role of the appeal site in that respect. As set out in my Proof of Evidence, while I do not dispute the historical connection/association between the appeal site and the Streatfield family and Rocks Estate, I do not consider that these factors should be relied on to define the setting of Buckswood Grange, nor do I consider it appropriate to conclude that such 'wider estate associations' qualify as a contribution to the significance of the listed building.

2.4 At 5.22, Ms Hall reinforces that her interpretation of the setting of Buckswood Grange is made not with regard to any experience of the heritage asset itself in its physical surroundings, but with reference simply to land within the Streatfield/Rocks Estate. I do not consider this to be the correct approach to the assessment of setting, as set out in paras 3.8- 3.29 of my Proof of Evidence.

2.5 In any event, in terms of the relevance of the historical connections between the appeal site and Buckswood Grange to the assessment of impact, the historical association between the appeal site and the Rocks Estate and Streatfield family would remain unaffected by development of the appeal site. It would still be possible to understand these historical associations in the same way they are currently understood; i.e. with reference to historical maps and sources; regardless of how the appeal site is developed.

2.6 Further, Ms Hall's assertion at 5.22 that '*the open pastoral Downlands farmland* [was] *clearly part of an articulated arrival sequence'* in respect of Buckswood Grange is not evidenced in her proof, which only evidences the presence of an historical access through the woodland (which is not disputed by my evidence).

2.7 Crucially, Ms Hall's assessment of significance, setting and impact gives no apparent regard to the reality of the situation on the ground and how the landscape and these relationships - and their contribution to the experience of the listed building - have evolved and changed since the 19th century; i.e. Ms Hall's conclusions disregard that the historical route is no longer extant or navigable within the appeal site, nor that it no longer connects to Buckswood Grange beyond.

2.8 At 7.13 Ms Hall makes the point that the EDP Heritage Addendum '*ignores the prominence of the proposed access to Fir Tree Grove'* in relation to the entrance to Buckswood Grange. The conclusions of the Heritage Addendum and my Proof of Evidence are made with due regard to the proposals in the Chicory Cottage/ Fir Tree Grove portion of the appeal site. However, I conclude that the proposals would not result in any material change to the experience of the significance of Buckswood Grange listed building itself, or affect any aspect of the setting of Buckswood Grange that contributes to its significance.

LAKE WOOD

2.9 I note that Appendix 2 of Ms Hall's evidence identifies that, contrary to the assumption in my Proof of Evidence that the southern part of Lake Wood was landscaped in a 'Picturesque' style in the first half of the 19th century presumably at the time of the construction of The Rocks house (Buckswood Grange), it is more likely that the landscaping of Lake Wood was undertaken in the late 18th century, along with the laying out of driveways and construction of tunnels under Rocks Road, some time prior to the construction of Buckswood Grange in 1838.

2.10 At 5.31 Ms Hall identifies that Lake Wood retains at least one direct physical link with Buckswood Grange via the gated underground tunnel under Rocks Road. My Proof of Evidence indicates that there are no extant direct physical links and I accept this correction.

2.11 Despite Ms Hall's evidence on this matter, the conclusions of my own 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 extant 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.

2.12 Therefore, Ms Hall'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.

2.13 At 5.32 Ms Hall asserts that *"The open farmland setting to the north afforded drama on the approach, serving to highlight the contrasting character of Lake Wood, whilst also being a productive part of the estate."* The suggestion that the farmland within the appeal site forms a component of a designed landscape is not supported by any evidence and, given that the approach Ms Hall refers to was itself historically directed through woodland, I see no basis for Ms Hall's assertions.

2.14 Ms Hall asserts at 7.8:

"The introduction of development and the attendant activity close to the northern edge of Lake Wood, on higher ground, would introduce visible built form together with lighting, noise and activity which would adversely affect the tranquil qualities of the designed landscape and understanding of it as part of a gentleman's retreat on the edge of Uckfield, and thereby detract from the appreciation of its significance".

2.15 Ms Hall goes on to identify that this impact would arise at the northern part of Lake Wood, noting that this would be experienced from a series of 'desire lines' within the north extents of the wood leading into the appeal site.

2.16 Ms Hall does not state why the experience from the informal desire lines through the woodland are relevant to the historic Interest of Lake Wood. It was also clear to me on my site visit that Woodland Trust signage at Lake Wood requests that users of the woodland use only the defined tracks.

2.17 As set out in my own Proof of Evidence, this northern edge of Lake Wood and the relationship with the appeal site makes no contribution to the heritage significance of Lake Wood in its current form. Instead, the surviving elements of Lake Wood that contribute to its historic interest are focussed further south on the lake, rock outcrops and defined paths around it, which do not incorporate any experience of the appeal site and would remain unchanged by the implementation of the appeal proposals. Ms Hall appears to endorse this at 5.29 where she identifies in respect of the defined boundaries of the designed landscape associated with Buckswood Grange that "*the topography and woodland provided effective natural barriers*".

CHICORY COTTAGE

2.18 Ms Hall's evidence at 5.35 essentially confirms that Chicory Cottage has no notable inherent architectural significance and equally identifies that its historic interest is similarly minimal and derived only from an historical association with the Rocks Estate. On the basis of Ms Hall's evidence, I see no reason why Chicory Cottage should be treated as a heritage asset.

DOWNLANDS FARM GROUP

2.19 Ms Hall's evidence at 5.37 to 5.70 reinforces that her interpretation of the setting of the listed buildings and non-designated Partridges Oast at Downlands Farm is made not with regard to any experience of the heritage assets themselves in their physical surroundings, but with emphasis simply to land with historical association. I do not consider this to be the correct approach to the assessment of setting, as set out in paras 3.8- 3.29 of my Proof of Evidence.

2.20 In this way, Ms Hall's evidence overplays the contribution of historical, social and economic connections of the appeal site to the significance of these heritage assets and similarly the role of the appeal site in that respect. As set out in my Proof of Evidence, while I do not dispute the historical connection/association between the appeal site and the Downlands Farm buildings and wider Rocks Estate, I do not consider that these factors should be relied

on to define the setting of the heritage assets, nor do I consider it appropriate to conclude that such associations qualify as a contribution to the significance of the heritage assets.

2.21 Paragraph 7.19 of Ms Hall's evidence in respect of the 'Downlands Farm Group' addresses the modern woodland at the western end of the curtilage of Partridges Oast and asserts that this woodland is "*an ephemeral feature with no formal protection, [and] should not be relied on".*

2.22 In the absence of any evidence for proposals or an intention to remove this woodland, which has been extant over half a century, I can only assume it will remain in place for the foreseeable future. As such, my assessment and evidence is necessarily based on these baseline circumstances, rather than a hypothetical future scenario.

2.23 In terms of whether this woodland should be considered "*an ephemeral feature with no formal protection*" as Ms Hall contends, I defer to the evidence of Mr Forbes-Laird on arboriculture matters.

CUMULATIVE IMPACT

2.24 Under this heading at para 7.24, Ms Hall asserts:

"I have set out above how each of the heritage assets relates to the significance of Buckswood Grange as constituent parts of the former Rocks estate. The cumulative effect of effectively surrounding the heritage assets with modern residential development and associated infrastructure would greatly diminish any legibility of the group value of the whole (Appendix 1). It would dramatically affect the perception of Buckswood Grange as a large country house on the outer edge of the town and within an extensive landscape of ornamental and functional features which sustained the estate. This elevates the level of harm to Buckswood Grange, such that it would cumulatively be at the moderate level of less than substantial harm and subject to the provisions of Paragraph 202 of the NPPF."

2.25 There is no basis in guidance for the approach to assessment of cumulative impacts Ms Hall undertakes, of inflating the level of harm to Buckswood Grange by considering it 'cumulatively' with perceived impacts on other heritage assets.

2.26 Paragraph 28 of Historic England's 2015 guidance *'Managing Significance in Decision-Taking in the Historic Environment Historic Environment Good Practice Advice in Planning: 2'* (GPA2*)* addresses cumulative impacts as follows:

"The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building's plan form or an original designed landscape."

2.27 The above extract from GPA 2 is clear that the cumulative impact of a particular development proposal is relevant to situations where it is considered in the context of the effects of previous developments. It does not refer to cumulative impacts resulting from an increased level of harm to a particular asset because a single development may affect multiple assets.

2.28 There is therefore absolutely no basis in guidance for the aggregation of individual harms to a number heritage assets to arrive at an increased level of harm to a specific heritage asset, as Ms Hall contends in respect of Buckswood Grange.

APPELLANTS APPLICATION DOCUMENTS AND RESPONSE

2.29 In this section, beginning at 6.1, Ms Hall makes a number of points critiquing the Appellant's heritage assessments.

2.30 I reject the assertion that the Appellant's submission as part of planning application does not provide a robust assessment. My Proof of Evidence sets out the methodology applied in those assessments. Like the assessment set out in my Proof of Evidence, this comprises a proportionate assessment in line with para 194 of the NPPF, which states: *"The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance"*.

2.31 Similarly, in contrast to Ms Hall's evidence, my assessment adheres to the guidance set out on page 8 of Historic England's GPA3, which states: "*technical analyses of this type should be seen primarily as material supporting a clearly expressed and non-technical narrative argument that sets out 'what matters and why' in terms of the heritage significance and setting of the assets affected, together with the effects of the development upon them*."

2.32 At 6.9 Ms Hall identifies:

"Two major points of contention with the interpretation of setting and its contribution to significance, including:

- *The suggestion that the carriage route does not survive (CD2/103, paragraph 1.76). My site visits have shown sections of it to be clearly identifiable in Lake Wood and Thirty Acre Wood and in the western section of Shermanreed Wood/ south-west section of Budletts Wood (Appendix 1); and*

- *The suggestion that there is no experience of the land within the site from Lake Wood (CD2/103, paragraph 1.79). My site visits have shown there to be a number of desire lines showing direct access between Lake Wood and the Appeal Site, and intervisibility with the Appeal Site from the upper woodland path (Appendix 1)."*

2.33 In respect of the first point, Ms Hall's apparent assertion that the carriageway does survive 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 Hall 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 Hall 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'.

2.34 In respect of the second point, Ms Hall misrepresents the HA (CD2/103), which in fact states "*From the paths within the woodland maintained by the Woodland Trust in Lake Wood, it was observed that there is no experience of the land within the site."* Ms Hall identifies views outwards to the appeal site from the northern edge of the wood from informal 'desire lines', the use of which is discouraged by the Woodland Trust on the basis of the harmful effects arising on the fabric of the woodland. I therefore do not consider that the experience from these peripheral areas of the woodland is of relevance to the historic Interest of Lake Wood.

CONCLUSIONS

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

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