**From:** Heather Hall
**Sent:** 02 December 2022 16:36
**To:** Claire Turner
**Cc:** planning
**Subject:** FW: WD/2022/1637/MEA - Downlands Farm - Conservation Officer comments

**Categories:** Consultee

Dear Claire,

Further to the agent's queries on the consultation response, please see my further comments below in red.

**Heather Hall | BArch, Msc Historic Building Conservation, IHBC**
**Heritage Officer**
Planning and Environmental Services, Wealden District Council
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**From:** Joshua Mellor [redacted]
**Sent:** 20 October 2022 10:29
**To:** Claire Turner <Claire.Turner@wealden.gov.uk>
**Cc:** [redacted]
**Subject:** WD/2022/1637/MEA - Downlands Farm - Conservation Officer comments

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Morning Claire,

We have reviewed the Conservation Officer's comments in respect of the impact of the scheme on several heritage assets, as well as the request for additional information/clarification. Given the breadth of the comments, it would be useful to arrange a meeting to discuss the identified heritage issues and the way forward in terms of the approach to addressing the concerns. We have set out below some of the issues which we require clarity on in order to be able to move forward with a response or additional information. Please can you liaise with the Conservation Officer on this?

- Para 6 mentions Chicory Cottage, '*which has the potential to be considered a non-designated heritage (if not curtilage listed)*'. However, Chicory Cottage is not identified by WDC as a non-designated heritage asset and clearly it does not qualify to be curtilage listed in respect of any other listed building. Can WDC confirm their position on this?
  A more thorough review of the planning records suggests that Chicory Cottage may have been separated from The Rocks Estate in c.1977, prior to the listing of Buckwood Grange in April 1978, meaning that it is not curtilage listed. At the time of its separation, the former butler's house was enlarged with a 1-bay

(two windows) two-storey extension to the north-west end, and apparently with some rebuilding across the end bay of the original dwelling (two windows). Comparison of the 1977 plan with the recent sales particulars suggests that the modern extensions have not compromised the historic envelope, and the historic core of the building retains much of the historic layout. More generally, the extensions and alterations, including replacement windows, have broadly respected the character of the building, such that the sales particulars positively present it as a period property '*built in the 1890's as the butler's house for Buckwood Grange*'. It is noted, however, that a property is present in this position on William Figg's 1829 map of Downland Farm (The Keep Reference ADA229-02) and on the Uckfield Tithe Map of 1841, neither of which were apparently examined as part of the AHA. The AHA is dismissive of the building, suggesting only that the substantial alterations have compromised any architectural interest (Para 4.77 and 5.51), but without any more informed assessment. Considering the proposal for demolition, and resulting total loss of any potential significance, it would not be disproportionate for this to be assessed in more detail at this stage. Further, the house lies in generous landscaped gardens with rocky outcrops, which broadly reflect the curtilage since at least the 1841 tithe map, and are consistent with other features of the Rocks Estate. It has a close relationship with Lake Wood and Fir Tree Grove, and has a clear historic relationship to Buckwood Grange. I therefore conclude that it has a degree of significance meriting consideration in planning decisions because of its heritage interest.

- Para 6 (and 10) mentions '*further unlisted historic buildings at Downlands Farm Cottages… which may also have the potential to be considered non-designated heritage* assets' can WDC confirm a clear position on this as currently they are not identified in policy as such. None of the buildings at Downlands Cottages (former Bridge Farm) align with the location of buildings on historic mapping, and the current dwellings all appear modern. Therefore no further assessment is considered appropriate in this context.
  EDP's own identification/exploration of Chicory Cottage as a possible NDHA should be noted. The inclusion of the historic properties as potential NDHA's under 'Heritage considerations' reflects only Step 1 of our own settings assessment, identifying features of the historic environment surrounding the site. As regards Downlands Cottages, at least one of the buildings (No. 2 Downland Farm Cottage) has a similar footprint as a building on historic maps at the former Bridge Farm, and my own assessment has shown Bridge Farm had a relationship with both Rocks Estate, and latterly Downlands Farm itself. The main body of the response under 'Consideration of the proposals' (i.e. para 10) refers only to this perceived oversight of the baseline study (i.e. Section 4 of the AHA) and therefore understanding as part of the setting of Downlands Farm. Based on our present understanding of this group, we do not consider Downlands Cottages to be non-designated heritage assets.

- Paragraph 9 identifies reservations that the AHA is not '*rigourous enough to support its conclusions'* with refence to 'the former Downlands Farm group'. We would be grateful for some clarification as to what is perceived to be lacking in this respect. Para 10 mentions the evolution of these building in the 20th century, although it is considered that that is addressed in a proportionate way in the assessment given that the buildings are not located in the site.
  As alluded to above, it is our view that a more thorough map regression – as recently completed for Charlwood Manor which shows a number of additional maps of Downlands Farm and the Rocks Estate (see WD/2021/1764/MAJ) – and a more thorough understanding of the relationships demonstrated by the tithe maps, was and is required. In fact, the only mention of Charlwood Manor, as the former Downland House and farmhouse of Downland Farm, is under the baseline study (para 4.71) and excluded entirely from the settings exercise. At paragraph 5.14 it mistakenly identifies the former barn adjacent, and now linked to, the oast as the farmhouse (see T/1953/1007/F). The map regression/baseline exercise lacks any exploration of the evolving relationships between structures, with separation of Charlwood House and provision of the new farmhouse Gormanston, coalescence with Bridge Farm (and/or provision of a group of new workers dwellings in its place at Downlands Farm Cottages) and later move to poultry farming which saw large sheds built to the south of the historic farm buildings, all of which reflect a partial shift from its northerly focus to a more central relationship with the farmland to the west, and the broader relationship with the Rocks Estate. It also lacks any analysis of Buckwood Grange, including the historic landscape features which surround the site, most notably Lake Wood, and in the context of additional 19th century parkland north of the site, adjoining Paygate Wood and lower parts around Budletts Wood, which was also part of the Rocks Estate. In my view, these omissions seriously hinder the ability to understand and assess which parts of the present experience of the farm buildings contribute to their significance via their setting(s). I disagree with the interpretation that this relates only to the residential curtilage of the former farm buildings due to their conversion. In terms of the experiential qualities of setting, the response clearly identified concerns with a perceived lack of understanding of the kinetic or experiential attributes which contribute to setting; and with an

over-reliance on existing levels of public accessibility – and gives examples including the relationship between Buckwood Grange and Lake Wood and between the agricultural land and Downlands Farm in the north-eastern part of the site, with expansion of both these concerns in paragraphs 12 and 13.

- Paragraph 10 mentions Downlands Farm and the lack of analysis in the AHA in respect to Bridge Farm (Downlands Cottages), Downlands House and Gormanston. Bridge Farm is addressed in the point above. For Downlands House, this is not in the site and neither is there considered to be any potential for the development proposals to change its relationship with the buildings at Downlands Farm. We do not consider that further assessment is warranted. Gormanston is not identified by WDC as a heritage asset. It is a mid-20th century house and therefore no assessment is considered necessary.
  As noted above, the point being made in Paragraph 10 refers to the somewhat cursory nature of Section 4 of the AHA. Under Step 2 of GPA3, Paragraph 26 states:

  '*We recommend that this assessment should first address the key attributes of the heritage asset itself and then consider:*
    - *the physical surroundings of the asset, including its relationship with other heritage assets*
    - *the asset's intangible associations with its surroundings, and patterns of use*
    - *the contribution made by noises, smells, etc to significance, and*
    - *the way views allow the significance of the asset to be appreciated*'

  It goes on in Paragraph 27 to state '*it will generally be useful to consider, insofar as is possible, the way these attributes have contributed to the significance of the asset in the past (particularly when it was first built, constructed or laid out), the implications of change over time, and their contribution in the present'.* And in Paragraph 29 to state '*This assessment of the contribution to significance made by setting will provide the baseline for establishing the effects of a proposed development on significance, as set out in 'Step 3' below. It will, therefore, be focused on the need to support decision-taking in respect of the proposed development.*'

  As I have found Step 2 somewhat lacking, it is difficult to support the conclusions made in the assessment. The changes over time in the surroundings of the assets here have inevitably have some influence on the way the assets are experienced, and their early historical relationships are perceived, but I do not feel that these have been entirely invalidated as appears to be suggested by the AHA. I am also unconvinced that Step 3 has been adequately assessed, as there is no understanding of seasonal or diurnal changes associated with a development and infrastructure of this scale and nature, or understanding of the kinetic experience of these assets, and in particular the ways in which they will be newly experienced, as has clearly been set out in paras 11-13.

- Paras 10 and 13 refer to Buckwood Grange (the conservation officer identifies it as a GII* listed building; it is however GII). A minor point, but the WDC scoping response (18.11.20) did not identify this asset as relevant to the assessment of the site, but nonetheless a proportionate assessment was provided in the assessment accompanying the application. The AHA acknowledges that the farmland and woodland in the site has an association through historic ownership, as does most of the surrounding land, but the findings of the assessment are that the site forms no part of the surroundings in which this asset is experienced. We would be grateful if the Conservation Officer can provide any information they have that enhances our understanding further. With respect to Lake Wood, again, this is not identified as a heritage asset by WDC and neither would the proposals affect this area or any contribution it makes to the setting of Buckwood Grange.
  I can confirm that Buckwood Grange is Grade II listed, not II* as I had mistakenly referred to. Regardless of whether this asset was referred to in the Scoping Exercise, a thorough assessment of the site's surroundings should have readily revealed the historic relationship between the Buckwood Grange and this land. This was clearly brought to light with the assessment of Chicory Cottage, and would also have been readily understandable from the map regression exercise had the baseline study focused sufficiently on understanding the historical setting and change over time, and should have therefore been addressed as part of the detailed settings assessment. I would also note that the 2020 pre-application advice under 'cultural heritage' clearly referred to '*four listed buildings to the north and south of the proposed application site*' which includes Buckwood Grange, and noted '*and therefore the potential impact on the setting of these listed buildings needs to be carefully considered.*'

  Contrary to the suggestion that '*the findings show that the site forms no part of the surroundings in which the asset is experienced*', Buckwood Grange does not form part of the detailed settings

assessment. The map regression exercise and broad discussion of the post-medieval to modern period in the AHA make no references to understanding of the historic relationship between Lake Wood and Buckwood Grange (see Paras 4.11 and 4.73), despite the proximity to Chicory Cottage and identification of other features associated with the former Rocks Estate (see 4.76 and 4.77). Lake Wood was part of the Rocks Estate from 1789 until the Woodland Trust acquired it in 1993. It is a publicly accessible site, with well-known associations to Buckwood Grange (see https://www.woodlandtrust.org.uk/visiting-woods/woods/lake-wood/, https://www.parksandgardens.org/places/buckwood-grange, https://www.sussexlive.co.uk/news/sussex-news/lake-wood-enchanting-hidden-gem-5505511). It is one of the few parts of the gardens which survives largely intact and the later development within the grounds of the house to the south have not, in my view, compromised it. GPA3 notes '*Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance…* '. As a designed landscape feature, it does form part of the setting of Buckwood Grange which informs its significance. Had the baseline information been thoroughly considered and the setting of this asset been properly explored, it would have identified sensitivities and/or opportunities.

- We would like to understand further the Conservation Officer's comments in paragraph 11, as we contend that the AHA fully accords with GPA3 guidance and the definition of the setting of heritage assets in the NPPF.
  As set out in the consultation response, the reasons that a more thorough assessment would *materially* affect the scheme include:
  - demolition of Chicory Cottage;
  - the boardwalk through Fir Tree Gove;
  - understanding the importance of Lake Wood and by extension, impacts on the extended setting of Buckwood Grange; and
  - understanding of the setting of Downlands Farm beyond just the residential curtilage/gardens which in my view, undervalues their relationship with the historic environment here - and recognition of how these are and will be experienced as part of the new development, particularly in terms of the kinetic and experiential qualities of experiencing the former agricultural buildings within their broader rural setting.

- Para 12 addresses concerns over the illustrated layouts. It may be helpful to undertake further discussion here, although the outline nature of the application for this part of the site must be acknowledged and therefore any design concerns might be better addressed at a detailed stage.
  I understand that the submitted site layout is indicative at this stage, however, I do not consider that the layout as shown on the illustrative plans would lead to the site being read as a sympathetic development within the setting of the heritage assets. The scale and shape of development would be in sharp contrast to the rural qualities of the area which presently characterises the setting of the assets this side of Rocks Road and Snatts Road, and represents significant urban expansion of Uckfield. Sensitivity to the heritage assets would likely lead to this appearing more isolated from the broader settlement pattern, and more of an intrusion into the historic environment. As such, and given other considerations on the site, it is difficult to see how the quantum of development proposed might be achieved in a manner which would not cause harm to the significance of the heritage assets. In these circumstances, it is fundamental to the aims of the NPPF and statutory duty as regards listed buildings that the understanding of significance, including any contribution made by setting, is properly understood such that the balancing exercise can be fully informed.

- Para 13 also addresses the proposals for the curtilage of Chicory Cottage, we think it would be of value to discuss the rational for the design of the proposals here, so officers are aware of the drivers for the inevitable demolition of Chicory Cottage.
  Noted, and I would be happy to have these discussions at the appropriate time.

Kind Regards

**Joshua Mellor**
Planning Associate Director
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