

Our ref: JCH01430/BH/i

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Date: 11th May 2023

Planning Case Officer
Waverley Borough Council

Dear Madam/Sir,

Re: Land East of Knowle Lane, Cranleigh WA/2023/00294: Rebuttal to Heritage Impact Assessment provided by Manorwood April 2023

I have been engaged by the applicant, Gleeson Land, to review and respond, as necessary, to the built heritage considerations raised in the Heritage Impact Assessment provided by Manorwood April 2023 as part of an objection to the application. This rebuttal letter needs to be read in conjunction with the Heritage Statement (January 2023) provided by RPS and submitted in support of the application.

The objector's Heritage Impact Assessment (HIA) concerns itself with built heritage issues only and makes no comment in relation to archaeology. It should be noted that the HIA employs the Historic England (then English Heritage) *Conservation Principles* 2008 guidance [HIA: 5.1-5.15] to inform their assessment of relevant heritage assets' significance. This guidance document has been superseded by the current iteration of the PPG [18a-006-20190723] and it is this current guidance that informs the analysis in the Heritage Statement (HS). The current guidance defines the interests of heritage assets as: archaeological interest; architectural and historic interest; and historic interest [HS: 2.18].

The HIA correctly identifies the same three designated built heritage assets as having their significance affected by the proposed development as identified in the Heritage Statement (HS). These are the Grade II listed Coldharbour Farm ('the farmhouse'); the West Barn; and The Brew (the latter two collectively 'the Farm Barns'). The HIA additionally identifies the building Redhurst, located to the southeast of the Site's central section, as a non-designated built heritage asset. The HS does not identify Redhurst as a non-designated heritage asset.

Redhurst

The HIA is correct to note that Redhurst first appears in historic mapping on the 1895 OS map [HS: Fig.6]. The building is confusingly considered in the HIA to be a non-designated heritage asset [2.3] but not a 'Building of Local Merit' [2.4]. It is then asserted that the building, as 'Craneswood', is included on the Cranleigh Society's *Buildings of Local Merit* on-line list [2.4]. This on-line list was accessed 11th May at <https://www.cranleighsociety.org/buildings-of-local-merit/>. None of the 135 entries include either Redhurst or Craneswood.

Waverley Borough Council maintains a *Buildings of Local Merit* list. While noting that entries included on the list are considered by the Council to be non-designated heritage assets, the Council has not published any criteria for their identification [reference to relevant guidance in the PPG see HS: 2.21-2.22]. Buildings of Local Merit are recorded on the Council's interactive planning map. Neither Redhurst or Craneswood are identified on this map when accessed on the 11th May. The nearest Building of Local Merit to the Site, as identified by the Council, is Knowle Lodge to the northwest positioned on the west side of Knowle Lane.

Redhurst/Craneswood's exclusion from the above two lists means that the building has not been identified by a plan-making body (Waverley BC) or a non-plan-making body (the Cranleigh Society) as a non-designated heritage asset. Notwithstanding this situation, the HIA, in its attempt to justify identifying the building as a non-designated heritage asset, sets out that its construction was commissioned by Lieutenant-Colonel Dillon [4.10]. An on-line search, <https://www.theprow.org.nz/people/constantine-and-fanny-dillon/#.ZF0eWRHMKUk>, notes that Dillon was the son of the younger son of the 13th Viscount of Dillon. Redhurst is also noted to have been the home of the "locally well-known" Frank Naumann who perished in the sinking of the Lusitania in 1915 (when nearly 2,000 people drowned) [4.11]. An on-line search, <https://www.cranleighmagazine.co.uk/joy-of-cranleigh-the-funeral-of-a-lusitania-passenger-may-18th-1915-september-2021/>, identifies Naumann as an international coffee trader and a founder of Cranleigh Freemason's Lodge in 1910.

It is wholly questionable whether either of these people identified by the HIA [5.7 & 5.15] imbue Redhurst with a sufficient level of historical association for the building to be consequently identified as a non-designated heritage asset. The HIA also makes no other assessment of Redhurst in terms of either archaeological interest; architectural and artistic interest; or on historic interest (other than citing the association with Dillon and Naumann) of the building.

The building was initially viewed by myself during the Site and area walk-over survey carried out to inform the HS. The building's late Victorian construction was noted and, when viewed from the public footpath, it could be seen that it had been subdivided into at least three residencies with associated twentieth-century remodelling and accretions. Consequently, much of any architectural and historic interest that it may have originally held has faced significant erosion. It was concluded that the building was unlikely to be identified as a non-designated heritage asset (confirmed by its non-inclusion on Waverley BC's *Buildings of Local Merit* list). As such, Redhurst was reasonably not considered in the HS, it is not a non-designated heritage asset and should not be the subject of consideration by the decision maker in this case.

Significance of Coldharbour Farm and Coldharbour Farm Barns (The West Barn & The Brew)

The objector's HIA and the applicant's HS concur in the identification of the Grade II listed Coldharbour Farm; the West Barn; and The Brew as the only designated built heritage assets whose significance will be affected by the Site's proposed development. Where these documents start to diverge is in the assessment of these three assets' significance (particularly in the contribution of setting to significance) and more profoundly so in the proposal's concluded degree of impact on these assets' significance.

The HIA and HS largely concur in terms of the three designated heritage assets' origins, their historic development, and the descriptions of the form and fabric of the buildings themselves. What is clear from the historic mapping provided in both documents is that the farmhouse has always been detached from the later, surviving former farmyard comprising the Farm Barns [HIA: p.17; HS: Figs 3-4]. What is not noted in the HIA is that the farmhouse is no longer in the same ownership as the Barns (since no later than 1979), its grounds are wholly domesticated and residential in character and the farmhouse is largely sequestered within the immediate setting of its gardens. While the farmhouse is seventeenth century in origin, the Barns are late eighteenth century in date [HIA: pp.7-8]. It is likely that the original farmyard contemporary with the farmhouse was adjacent to the farmhouse and the pond. While the Barns and Coldharbour Farm (the farmhouse) hold a group value, this would be greater if the Barns were contemporary with the farmhouse and that the agricultural use of all the buildings had not ceased by 1979.

In terms of the proposed development Site as part of the three designated heritage assets' setting, the HIA asserts that the assets' immediate and wider setting are "*indivisible parts of their historic value*" [5.8]. This represents a crude, indiscriminate and un-nuanced assessment. Differing parts of the assets' setting offer a different level of contribution to their significance and the greater, primary contributor to the assets' significance always remains the fabric, form and age of the buildings themselves. The assets' group value also offers a greater level of contribution to their significance than their wider setting (of which the proposed development Site is a part).

An important failing of the analysis in the HIA is that it effectively takes the three designated assets as one homogenous entity [6.7-6.8 & 6.29-6.30], whereas it is important to note that there is a significant difference between the setting of the farmhouse with that of the Barns, derived from their distinctly separated locations and a difference in the date of their origin. Consequently, the degree to which the Site contributes to their respective significance is uneven for different parts of the Site and is different between the farmhouse and the Farm Barns.

Coldharbour Farm (the farmhouse)

In terms of the farmhouse, the wider setting makes a secondary level of contribution to the asset's significance, limited to its proximity to the Farm Barns and the wider rural landscape which help to define its historic setting.

The contribution made to its significance from setting has been reduced by the cessation of an agricultural use, residential conversions, and the separation of ownership from the surrounding land and the Barns. The Site shares some glimpsed intervisibility with the farmhouse, limited to parts of the Site's central two fields and the field to the north of the Barns. When the limited glimpsed views are available from the Site's central fields, parts of the upper floor and roof of the farmhouse are visible set amongst extensive tree planting giving the asset a largely discrete and sequestered character within its now wholly domesticated garden. Such views do not provide any meaningful legibility of the asset's significance. The only notable visibility of the asset from beyond its garden are from the western and northern sides of the Barns. Consequently, the only notable visibility of the asset from within the Site (and therefore any meaningful legibility of its significance) is that from the area immediately north of the Barns, which is to remain undeveloped.

Overall, the Site can be said to make a small positive contribution to the significance of the farmhouse in helping to provide a part of the rural surrounds to the former agricultural dwelling. Wider setting makes a positive, though secondary, minimal level of contribution to the overall significance of Coldharbour Farm on account of the agricultural surrounds which form part of its historic setting and a part of its former agricultural lands. In terms of the proposed development Site, this is limited to parts of the Site's two central fields and from the field to the north of the Barns.

Coldharbour Farm Barns

In terms of the Farm Barns, domesticated by 1979, the wider setting makes a secondary level of contribution to the assets' significance, limited to their proximity to the previously associated farmhouse and the wider rural landscape which help to define its historic setting. The contribution made to its significance from setting has been reduced by the cessation of an agricultural use, and residential conversions and accretions. The Site shares some intervisibility with the Barns, limited to those parts of the Site north and south of the Barns, with the former to remain undeveloped.

Overall, the Site can be said to make a small positive contribution to the significance of the Barns in helping to provide a part of the rural surrounds to the former farmyard. Wider setting makes a positive, though secondary, level of contribution to the overall significance of Coldharbour Farm Barns on account of the agricultural surrounds forming part of its historic setting and a part of its former associated agricultural lands. This is limited to the fields immediate south and north of the Barns.

In terms of historic ownership, it is only known that the Site and Coldharbour Farm were in the same ownership at the time of the tithe map (1842). The HIA asserts, without evidence, that the Site and Farm have been "*under the same ownership from, at least, the late seventeenth century*" [6.10]. The farmhouse, the Farm Barns and their gardens are now wholly domesticated and are clearly apparent as such, whereas the HIA states that they "*have suffered [only] a degree of domestication*" [6.11].

It is agreed at a basic level between the two documents that the Site forms a part of the assets' wider setting (less so for the farmhouse than the Barns) but this is not, as stated in the HIA, "*a highly important contribution*" [6.14] and does not "*contribute so heavily to their significance*" [6.33]. The main contributors to why the assets have a high significance and, as a consequence, meet the criteria for designation as Grade II listed buildings, is due to the form and age of the buildings themselves, with their group value. The three assets are not designated due to their former farmland; the assets' listing citations make no reference to any farmland [HIA: pp.7-8].

Impact on Designated Heritage Assets' Significance

Contrary to the assertion in the HIA [6.15], the proposed development will introduce no built form to the north of the Farm Barns.

The HIA is correct to note that there are some views of the heritage assets from the PRoW to the south of the Farm Barns [6.16]. There are views of the Barns that offer some legibility of these assets as parts of a former historic farmstead, but these views do not reveal all the significance of the Barns, which is most readily legible from their interior and, secondly, from within their immediate setting (their gardens and the field to the north. From the PRoW viewpoint they might be read as a former High Victorian farmstead converted to residential use. Their eighteenth-century origin and form is not legible. Additionally, there is no meaningful legibility of the farmhouse's significance from the PRoW due to its sequestered nature within its well-planted, domesticated garden [6.17].

The proposed development Site does not "*allow for the full appreciation of the farmstead*" [6.18]. It is, however, recognised in the HS that the proposed development will introduce built form into a part of the former farmland to the south of the former farmstead (there is pre-existing built form to the south the Site's western central field). The proposed development will introduce built form to the south of Coldharbour Farm and the Farm

Barns. The visually more exposed Barns will see the greater change to their setting. The former farmhouse, being set in heavily treed private gardens, will be very much more screened from the proposed development.

The HIA makes reference to the proposed development including landscape planting and the reinstatement of hedgerows [6.23], in particular between the Farm Barns and the proposed built form to the south. In this regard, the proposed development includes the reinstatement of an historic hedgerow to the south of the Farm Barns last seen on historic mapping in 1961 [HIA: pp.17-18]. The 1874 OS mapping provides particularly compelling evidence of the previous existence of this historic hedgerow [HS: Fig.5].

Level of harm

The HIA wrongly concludes, following its serial inflation of the development Site as a contributor to the designated assets' significance and its treatment of the three assets as one homogenous asset, that the proposed development will cause a substantial level of harm to the significance of these three designated heritage assets [6.34]. Consequently, for the decision maker, the HIA wrongly asserts that paragraph 201 of the NPPF is engaged in his case [6.35].

It is the conclusion of the HS that the proposed development will cause a less than substantial level of harm to the three designated assets' significance and that, for this case, paragraph 202 of the NPPF is engaged for the decision maker [HS: 5.11 & 6.6]. The planning authority are not tasked with weighing the harm to the three designated heritage assets' significance with substantial public benefits, as asserted in the HIA [6.36].

The PPG tells us that substantial harm, as alleged by the HIA for this case,

'is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest' [PPG: 18a-017-2019073].

It is my professional view that the harm to the three assets' significance caused by the Site's proposed development in a portion of their wider setting, as set out in the HS, does not seriously affect a key element of the assets' special architectural and historic interest (significance).

The most illuminating case law that covers such considerations and affords the decision maker most help in this case is the Bedford judgement [[2013] EWHC 2847 (Admin)]. In this judgement Mr Justice Kay concluded that:

'For harm to be substantial, the impact on significance was required to be serious such that very much, if not all, of the significance [of the heritage asset] was drained away' [paragraph 24].

Kay J. continued that substantial harm is:

'An impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced' [paragraph 25].

It is not the case that the harm to the three assets' significance caused by the Site's proposed development in a portion of their wider setting, as set out in the HS, will drain away much of, let alone all, of the three designated heritage assets' significance. By the same token, the proposed development will not very much reduce the significance of the three designated assets, let alone vitiate it. Any development proposal leading to a much reduced or even vitiated significance of a designated heritage asset would likely result in that asset's loss of its designated status. None of the three designated heritage assets affected by this case are in any danger whatsoever of losing their listed status.

Conclusion

As set out above, the analysis set out in the objector's Heritage Impact Assessment, in addition to including factual errors (the status of Redhurst/Craneswood), grossly overstates the contribution of the Site, as a portion of the assets' wider setting, to the three designated heritage assets' significance. Consequently, the HIA wrongly concludes that the proposed development will cause a substantial level of harm to the assets' significance.

This is a profoundly overinflated conclusion on the proposed development scheme's level of impact to the historic built environment. The Heritage Statement provided in support of the application correctly concludes that the proposed development will cause no higher than a low level of harm within the spectrum of less than substantial harm. Consequently, and in line with paragraph 202 of the NPPF, the harm to the significance of the three designated heritage assets should be weighed by the decision maker against the public benefits of the proposed development, as set out in the planning statement supporting the application, where clear and convincing justification for this less than substantial level of harm is also set out.

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The analysis and conclusion set out in the Heritage Statement remains appropriate to inform the decision maker in regard to the proposed development and built heritage considerations. The flawed analysis and grossly inflated conclusion (in regard to the alleged level of built heritage harm) set out in the objector's Heritage Impact Assessment does not accurately inform this case and, as such, needs to be rejected by the decision maker.

Yours sincerely,
for RPS Consulting Services Ltd

A handwritten signature in black ink, appearing to read 'Jonathan Smith', is positioned above the printed name and title.

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