



HAMMERWOOD PARK

near East Grinstead, Sussex

RH19 3QE - 01342 850594

9th January 2023

Wealden District Council
Planning Department

Dear Sirs

Applications WD/2022/2372/MAJ and WD/2022/2373/LB - Ashdown House - Forest Row - Sussex

This OBJECTION relates specifically to Planning and Environment issues and I will be submitting observations on Historic Building and Landscape preservation separately.

Wealden policies were carefully formulated to assist the Council resist such applications as these. It is of concern therefore to read in the application that a planning officer has given pre-planning advice to the applicant that the development might assist Wealden in meeting its housing quota.

In 1995 I was elected to Wealden District Council for the Forest Row Ward and served on the Strategic Planning Committee which oversaw the formulation of the 1998 Wealden Local Plan of which much was retained by the Adopted Core Strategy 2013. Having been involved in the formulation of the policy puts me in a relevant position to remind all concerned the *raison d'être* for such policy both for the District, for the environs of Ashdown Forest, the High Weald and the AONB in order that applications such as these should be firmly refused.

The application fails to meet: Policies and Aims of Core Strategy 4, SPO1, SPO2, WCS6, West Sussex Transport Plan paras 7.121-4, Wealden Local Plan para 9.33, TR3, GD2, paras 9.12.2, 9.12.8, 9.12.11, DC17, DC18, DC20, EN27, PPS5

In failure to look beyond the boundary of the site for the creation of 47 dwellings the developer has been myopic, failing to appreciate impact on the AONB, the local road, the village and the constraints of transport in this part of the District.

1. ADOPTED CORE STRATEGY

Detriment to the countryside: Core Strategy 4 - Vision and Spatial Planning Objectives

Our vision is that: By 2027 Wealden will have successfully accommodated growth to meet future needs whilst protecting and enhancing its essential rural character and high quality environment and promoting the countryside as a resource for recreation and tourism.

SPO1 We will help manage countryside resources and assist in the development of the rural economy whilst protecting and enhancing recognised biodiversity and geodiversity attributes, in particular we will protect the internationally important sites . . . and Ashdown Forest and other designated areas of bio and geodiversity. We will also protect, and will work with others to enhance and manage, the distinct landscapes of the District .

SPO2 We will ensure that the intrinsic quality of the historic environment is protected and that Wealden's environmental, heritage and cultural assets are used appropriately to encourage suitable tourism development and support inward investment

These policies apply to the site within the High Weald AONB. The division of the historic house will prevent public access to the heritage structure contrary to the tourism strategy and fails to appreciate its significance historically and to the tourist attractiveness of the District. The creation of 47 units will bring both randomness and increase of human activity affecting local farming, core of the countryside, and dogs and their walking needs contrary to the interests of farming livestock, and domestic cats disastrous for wildlife and biodiversity.

This goes to the distinction between the character of countryside, and of suburbia, and in pristine countryside such as this the relevance of maintenance of policies intended and framed for the purpose of protecting the countryside and biodiversity are paramount. This is not merely concerning visual character of the countryside but the operational aspects of agriculture that support it - how it functions or doesn't.

The proposed development does not support the rural economy, in contrary to biodiversity and contrary to the interests of the historic environment and tourism, particularly by reason of fragmentation, therefore contrary to Core Strategies SPO1 and SPO2.

Core policy WCS6 Rural Areas Strategy makes it clear that Development Boundaries will be retained specifically at Forest Row.

The application site falls so far outside the Forest Row Development Boundary specified by the 1998 Local Plan that it is obliterated on the plan by the map annotations. The applications therefore fall to be considered within Policy for the High Weald, The Area of Outstanding Natural Beauty, and are a stone's throw from the Ashdown Forest.

A public hearing should be necessary to depart from the Adopted Core Strategy. Granting planning consent without a public hearing would expose the Council to Judicial Review.

The Rural Areas Strategy placing Forest Row within the jurisdiction of a Development Boundary places the applications for consideration wholly within the thrust of the 1998 Wealden Local Plan protecting the countryside from development.

The site is isolated within the countryside and policies protecting the AONB.

Fortunately the current owner of surrounding agricultural land wishes the area to remain rural. However, a departure from policy in this site without transport constraints on Forest Row would provide precedent for a future owner and local authority to flood the area with development to the ruination of this especially sensitive area of the High Weald and gem of a historic building at its heart.

The site is unsuitable for a departure from policy and would be a dangerous precedent

2. TRANSPORT

Departure from the Local Plan Development Boundary provision for Forest Row is inappropriate specifically because of transport.

A central feature of 1990s District thinking was that transport would be encouraged around the M25, M23, A27 and A21 box with opportunities for development provided by access to those roads and giving favour to the A22 south of Uckfield and the A26 to the A21 to the north. In this way the sensitive Ashdown Forest and High Weald would not be put under pressure.

A further disincentive for the development of Forest Row is its proximity to the boundary of three counties at East Grinstead and the administrative difficulties of joined up thinking coordinating improvements for the A22. Housing expansion in Forest Row would put pressure either on roads traversing Ashdown Forest or for northwards commuting to Crawley, Gatwick and the M25, through East Grinstead.

West Sussex Transport plan <https://www.westsussex.gov.uk/media/17428/wstp.pdf> identifies East Grinstead as "a challenge".

Paragraph 7.121:

The current key transport issues in Mid Sussex are: . . . ■ Congestion on the A264 and the A22 during peak periods;

7.122 identifies A22/A264 in terms of "it is anticipated that some of the current transport issues will worsen if background traffic also grows as forecast. Therefore, interventions are needed in the District that will reduce car travel at peak times. If such interventions are not delivered or are not successful, then congestion at the following locations on the highway network is likely to worsen and measures may be required to protect vulnerable users and keep traffic moving"

7.124 At East Grinstead/Felbridge the A22/A264 Felbridge junction (on boundary, but mainly within Surrey), the A22/Imberhorne Lane junction and the A22 Lingfield Road junction are severely congested. As development comes forward in the area, this is likely to exacerbate rat running on rural routes as traffic seeks to avoid congestion.

Wealden Local Plan: High Weald Transport and Environment Strategy -

9.33 The County Council . . . will oppose schemes for East Grinstead in West Sussex, which

would lead to a significant increase in traffic in East Sussex, and it will not support bypasses for Forest Row and Nutley

As a result, since 1988 an East Grinstead bypass has been removed from all agendas.

Forest Row is thereby constrained from departure from policy in the provision of major development.

3. TRAFFIC

The development would intensify use of roads by car. Whereas the site in institutional use can cater for a significant number of people by reason of shared resources, communal dining, staff living and working on site with recreation on site and other needs catered for cohesively, fragmented ownership and use by individual units serving their needs individually will generate an order of magnitude greater traffic.

Ignoring the single track approach road with only two passing places and a dangerous junction with the Public Highway, the 47 units will place strain on roads for commuting to work, leisure with even the existing swimming pool being turned into yet more residential units, and shopping beyond walking distance to local shops. The hill from Forest Row to East Grinstead makes commuting by bicycle unrealistic.

District Plan Policy TR3 *Planning applications for new development will be permitted where the following criteria are met: (1) the proposed development does not create or perpetuate unacceptable traffic conditions;*

The development creates and perpetuates unacceptable traffic conditions:

- (a) the inadequate single track approach
- (b) a 230 year old bridge over the River Medway unfit for the scale of heavy traffic necessary for the development
- (c) the junction with the B2110 is dangerous for cars travelling from the east where the site entrance is grossly short of the stopping distance from the blind bend
- (d) traffic through Forest Row in 1998, paragraph 19.12.20 then had an adverse effect on the village centre, and through East Grinstead is critical

The buildings in educational use enable grouping of activity in contrast to the individual behaviours of 47 households. As an institution activities, hobbies and employment are significantly self contained. The application removes opportunities for employment and recreation within the site creating all the problems of patterns of car use and sustainability that planning policies seek to avoid.

The site is therefore constrained from departure from policy. The application fails the test of Policy TR3

4. WEALDEN LOCAL PLAN

Policy GD2 remains the Adopted policy:

GD2 Outside the development boundaries, as defined on the Proposals Map, development will be resisted unless it is in accordance with specific policies in this Plan.

Villages with Development Boundaries - 19.12 Forest Row

19.12.2 It is the Council's aim for Forest Row to maintain and enhance its residential character . . . whilst protecting . . . the surrounding countryside, Ashdown Forest and rural fringe areas from new development that would be detrimental to its character.

Development Boundary

19.12.8 A key aspect of the conservation of the environment at Forest Row is the restriction of further outward growth into the countryside which is recognised as having an outstanding quality through national designations. The development boundary, described below, reflects this aim

19.12.11 Along Hartfield Road, the development boundary includes existing development, together with new housing under construction whereas the more open land to the north has been excluded in view of its countryside character and the fact that it lies within the flood plain of the River Medway.

Extending development east of the development boundary would create ribbon development. On the Inset Map No.17 showing the Development Boundary the site is so far removed from imaginable development that it is obliterated by the map title and annotations.

5. POLICY FOR HOUSING OUTSIDE DEVELOPMENT BOUNDARIES

DC17 Housing development will not be allowed outside development boundaries, as defined on the Proposals Map, unless it conforms with other policies in the Plan.

EN27 Proposals for development will be permitted when the following layout and design criteria are met:- (4) the proposed development should not constitute an unacceptable backland or 'tandem' form of development;

As far as the Hartfield Road is concerned the proposal is backland development. As far as the site is concerned, the houses are proposed to be built creating new streets at the back and nether regions of the site.

The proposal fails EN27

DC18 Outside development boundaries, as defined on the Proposal Map, the replacement of an existing dwelling by another dwelling in the same curtilage will be permitted where the following criteria are met:

(4) it does not result in the loss of a property of valuable local character, unless it is not reasonably capable of being made structurally sound or otherwise improved. In sensitive locations, permitted development rights relating to future extensions and other structures may be removed.

The application is to remove in part a dormitory block which is arguably unsightly, rather out of fashion and arguably out of keeping with the Listed Building, although capable of being read as part of the complex as a whole, and replace it by residential housing of no better quality of design, if not worse, and wholly irrelevant to the Listed Building. In part it is to remove classrooms and other school buildings, a music school with theatre for drama and music, workshops and swimming pool to replace those also by further houses. The removal of the original buildings removes recreation from the site causing people living on the site to go out and for the site to cease to be self contained.

The proposals results in a loss of a property which provided educational infrastructure and local character to Forest Row. Other educational establishments were interested in purchasing the property but the property developer chose to out-bid them.

The proposals fail the test of Policy DC18

Subdivision of Larger Properties: 5.101 *There is a substantial legacy of larger properties, especially in countryside locations, including houses which are now too large for single family occupation together with certain other buildings, such as hotels and institutions of a residential nature. Such buildings are usually well integrated within the rural scene and their retention thereby encouraged.*

5.102 *The conversion and subdivision of larger properties may be appropriate where it maintains the integrity and character of the property, including its grounds, . . . as well as meeting the normal residential amenity, access and parking criteria. In addition, within particularly quiet, remote areas, the creation of a large number of dwelling units, with associated increases in activity, may be inappropriate.*

The proposed development is in an isolated spot surrounded by pristine countryside. The extent to which the activity is inappropriate is demonstrated by the Police response which frames needs of the development in terms of streets and street lighting.

The proposal fails to meet the thrust of Adopted Policies and their raison d'etre.

DC20 Outside development boundaries, as defined on the Proposals Map, the conversion and subdivision of a larger property into smaller dwelling units may be permitted where:-
(1) the character and integrity of the property, including its grounds and setting are suitably retained, including where appropriate by the removal of permitted development rights;
(2) no significant extension or alteration is involved.

The site has focused upon the Grade II* country mansion at the centre of an agricultural estate originally built in single ownership, now separated into site plus agricultural, but the site remaining integral in unified ownership this being an intrinsic quality of the site. As the

site of a Grade II* listed building this intrinsic quality is important not only for the character of the countryside but fragmentation into 47 divisions would cause irreversible harm. Integrity of ownership is key to the preservation of the Listed Building, its curtilage and character, maintenance, and further historical research of the site which is far from complete.

The application fails the test of Policy DC20

As of 1998 "A further 92 buildings in Wealden are regarded as being of more than special interest and are classified Grade II*.

4.109 These buildings should always be preserved and, where necessary, improved. Where such buildings are substantially unused or only partly used, it is important that their potential for rehabilitation and the accommodation of new uses is fully investigated before redevelopment is contemplated."

The application is redevelopment. Accommodation of continuation of the existing use of the site as a school was fully investigated during the sale and other educational establishments were interested in acquiring the site.

The property developer outbid others wishing to continue existing uses without paying due regard to the Adopted Policy and its *raison d'être*.

That the property developer did not pay due regard to transport, heritage, environment and countryside policies appropriate to the site before outbidding others is the responsibility of the property developer and not that of the Local Authority.

6. PLANNING POLICY STATEMENT 5

relating to the historic environment, Ashdown House was listed Grade II* in 1953 and the considerations for its listing status are inadequate in respect of near 70 years of further research and due appreciation of the work of the international architect Benjamin Henry Latrobe.

The applicant's Heritage Appraisal, in particular entitled *WD-2022-2373-LB_Report_2022.01.20-Ashdown House-AIS-FINAL_compressed* was not undertaken by an appropriate specialist. It is significantly deficient in ignoring

- Latrobe's international importance,
- the drawing in the RIBA Drawings Collection showing Ashdown House as the central block in the development of the sister house Grade I listed Hammerwood,
- the direct similarity of that drawing with Latrobe's drawing for President Jefferson of the Capitol Washington DC
- the significance of the use of Coade Stone at Ashdown
- the significance of the coffered dome of the entrance temple
- the significance of the design process direct from Ashdown's semicircular portico and Hammerwood's giant pilasters to the South Portico of the White House, Washington DC
- the significance of the domed ceilings on the top floor of Ashdown

- the significance of the staircase at Ashdown which was the model for the Pennock House, Virginia USA, no longer extant
- the Egyptian influence of Latrobe's first floor interior at Ashdown and his work with James Bruce, pioneer Egyptologist

all of which indicate that the building like Hammerwood should be listed of Grade 1 importance.

As many of these matters have been published on <http://www.hammerwood.mistral.co.uk/latrobelecture/> for over 20 years the application's presentation and representations are either deliberately blind or professionally inadequate.

Like the listed building, although not listed in its own right, the wider curtilage and Park, it having been known and built as Ashdown Park, is stunning. As at Hammerwood, the classical house is aligned with the landscape features of hills. On page 12 of the *WD-2022-2373-LB_Report_2022.01.20-Ashdown House-AIS-FINAL_compressed* the expert appears to have obtained extracts from the Park's owner's crop book of 1794 and 1797 whilst failing to recognise its importance. The book documents the park as parcels of agricultural experiment and practice in the rotation of crops in a scientific manner and is as stunning in its detail and content as the Red Books of Humphrey Repton.

The applicant's expert fails also to notice from the Crop Book and 1790s map, Lidar and satellite photography as basic tools in desk based study, the diversion of the River Medway to enable such agricultural cropping experimentation and that this also was Latrobe's expertise. Latrobe responsible for works to the Chelmer and Blackwater (river) Navigation Scheme, Basingstoke Canal and Rye harbour. In terms of documented Agricultural Revolution development, the water works and combination with the picturesque, the curtilage and landscape are outstanding and of prime historical importance.

A bumsrush property development at the site carried out as quickly as possible with such inadequacy of expertise paying only lip-service to heritage will be the most disastrous loss of heritage and of tourism and other creative opportunity the District will have ever seen.

Reducing the site to multiple divided residential units is a debasement of the heritage and not an enhancement.

In this and other ways the needs of the Planning Policy Statement 5 are not met.

The Local Authority is bound to policies adopted upon public hearing and formulated with good reason. **The policies relevant to the site, the village and district form a consistent narrative leading to what should be an unequivocal decision to REFUSE consent.** Not to do so would be publicly seen to be so unreasonable as to be contrary to the Wednesbury Principles.

Yours faithfully,
David Pinnegar, B.Sc., A.R.C.S.