

TOWN AND COUNTRY PLANNING ACT 1990

PUBLIC INQUIRY
LAND AT RIVENHALL AIRFIELD, ESSEX
INTEGRATED WASTE MANAGEMENT FACILITY

Ref APP/Z1585/V/09/2104804

Application ESS/37/08/BTE

PROOF OF EVIDENCE CG 4
HISTORIC BUILDINGS AND THE HISTORIC ENVIRONMENT

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ALAN STONES AADip TPDip RIBA MRTPI IHBC
ON BEHALF OF THE COMMUNITY GROUP

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1.0 PROFESSIONAL EXPERIENCE

- 1.1 My name is Alan Stones. I hold the Diploma of the Architectural Association and the Diploma in Planning of the Anglia Ruskin University. I am a Chartered Architect and Town Planner and Member of the Institute of Historic Building Conservation. I currently work as a consultant in urban design and historic building conservation.
- 1.2 I have worked in both local government and private practice. From 1975 to 1987 I worked in Essex County Council's historic building conservation team handling casework on listed building alteration proposals and also the analysis and protection of conservation areas, supplying specialist advice to District Councils on listed building and conservation area applications. From 1987 to 1997 I specialised in urban design work within the County Council being, amongst other things, co-author of the Essex Design Guide for Residential and Mixed Use Areas. In 1997 I became Head of Historic Buildings and Design at the County Council and also resumed historic building casework.
- 1.3 In 2000 I left the County Council and joined the Coggeshall urban design and architecture practice of Melville Dunbar Associates, where I became Principal Director. There I was responsible mainly for new residential projects. In 2003 I left to form my own consultancy.
- 1.4 From 2002 to 2004 I was Chair of the Urban Design Group, the national professional body for urban designers.
- 1.5 I am a local resident of Kelvedon and am chair of the Community Group. I have, however, approached my evidence as a professional instruction.

2.0 THE HISTORIC ENVIRONMENT

- 2.1 The site occupies part of the boulder clay plateau that was used for the second world war Rivenhall Airfield. This operation, whilst destroying most of the parish and field boundaries and resulting in woodland clearance, did little to change the prevailing topography.
- 2.2 Within the plateau landscape are groups of historic buildings, many listed, which are defined on the Chapman and Andree map of 1777 (see Appendix A). Woodhouse Farmhouse and an ancillary building are part of the application site and lie close to the proposed flue, and are also associated with a moat identified in RCHM Essex Vol III p.142. Closely related visually to the east are the listed farmhouse and barn of Allshots Farm. To the west is Sheepcotes Farmhouse, also listed.
- 2.3 More distant are other farm complexes or former farm complexes which can be seen from the site or from which the site is visible:- Rook Hall and Goslings Farm, both listed, Herons Farm and Haywards Farm, which are both historic buildings though unlisted. Porters Farm and Parkgate Farm (the former listed) are a similar distance from the application site, and the site is also visible from them.
- 2.4 The village of Silver End lies to the south west. This was a model village created by the Crittall Company to support its metal window factory (now demolished). As an important collection of Modern Movement buildings, the village was designated as a conservation area in 1983 with a later Article 4 Direction to safeguard the character and appearance of the area, and the individual houses. The village contains a number of listed buildings, notably three managers' houses, one of which, Wolverton, is visible across open country from the direction of Sheepcotes Farm, and the site is visible from it. Whilst much of the rest of the perimeter of the

village is wooded, the flat, plateau landscape means that there is a strong visual connection between the village and the appeal site, particularly visible from footpath 53.

- 2.5 Rivenhall Airfield was built in 1943 and was typical of scores of such installations constructed after the advent of the USA into the war against Germany. Generally, flat, plateau sites were chosen, and East Anglia was favoured as offering the shortest route to the industrial centres of the Ruhr. The airfield was laid out with the standard three runways of the period, two hangars, crew accommodation, control tower and bomb dump. During its two short years of operation, its American squadrons took part in two of the largest airborne actions of the war, the invasion of Europe and the airborne crossing of the Rhine. The airfield finally closed in 1946. The hangar near Woodhouse Farm is currently used for grain storage but proposed for demolition. That adjacent to Sheepcotes Farm is used for a craft business.
- 2.6 Within the airfield perimeter a camp of second world war vintage prefabricated buildings for Polish refugees was established during the war years. This is now an industrial estate. Another group of huts was used for homeless people, but has now been demolished. From 1956 Marconi Radar leased parts of the airfield and erected a number of lattice towers for radar testing and research. The one adjacent to Sheepcotes Farm is still in use. There are memorials to the wartime use of the airfield at the Polish Camp and in the grounds of the Western Arms public house in Silver End.

3.0 THE LISTED BUILDINGS AND THEIR SETTINGS

- 3.1 Woodhouse Farmhouse was listed Grade II in 1988. It is described as being of early 17th century date with later extensions. It has an oak frame and a queen post roof with hand made plain clay tiles. Brenda Watkin, the County Council's historic buildings adviser, considered in 1995 that the main part of the building was more likely to have been of 16th century date. The list description is at Appendix B.
- 3.2 The site itself is one of the oldest in the Kelvedon parish, having been occupied on and off since Saxon or possibly Roman times. It is a moated site indicating occupation from the 13th or 14th century, and was evidently considered of importance even when laying out the airfield, since the perimeter track is curved around the site instead of following a straight line.
- 3.3 The farmhouse building is in a poor state of repair and has been on the Buildings at Risk Register, condition described as 'very bad', since 1987. Rot caused by the ingress of water through the roof led to the roof having to be cased in corrugated steel in 2000 at the request of a District Councillor. Windows are broken and not secured.
- 3.4 A pump is also listed, which in 1995 was being destroyed by an adjacent Shrub (see list description at Appendix B).
- 3.5 An ancillary building to the rear is listed Grade II. It is described as a bakehouse, brewhouse and stable and is of 18th century date and timber framed. In 1986 it was in good repair, but subsequent lack of maintenance led to the total collapse of the roof. By 1995 a scaffold with corrugated roof had been erected. Originally there were sheeted sides, but these are in shreds. This building has also been on the Buildings at Risk Register,

condition described as 'very bad', since 1987. The list description is at Appendix B.

- 3.6 Other farm buildings of traditional construction are in a state of collapse.
- 3.7 Allshots Farmhouse and barn were listed Grade II in 1988. Documentary evidence of the farm goes back to 1636. A number of industrial uses have accumulated in the farmyard, included a vehicle scrapyards, which almost conceal the original buildings from the west. The list description is at Appendix B.
- 3.8 Sheepcotes Farmhouse was listed Grade II in 1973. It is described as a late 16th or early 17th century timber framed house, refronted in brick in the 18th century with a parapet, string courses and sash windows. An early 16th century barn adjacent has been reroofed in corrugated iron.
- 3.9 Documentary evidence of Sheepcotes goes back to 1428, and it is clear that the area had a long history of continuous occupation and farming activity, with the same families connected to several holdings.

4.0 POLICY GUIDANCE

- 4.1 English Heritage's Conservation Principles, Policies and Guidance 2008 states (paragraphs 162 and 163): 'Every reasonable effort should be made to eliminate or minimise adverse impacts on significant places. Ultimately, however, it may be necessary to balance the public benefit of the proposed change against the harm to the place. If so, the weight given to heritage values should be proportionate to the significance of the place and the impact of the change upon it. The historic environment is constantly changing, but each significant part of it represents a finite

- resource. If it is not sustained, not only are its heritage values eroded or lost, but its potential to give distinctiveness, meaning and quality to the places in which people live, and provide people with a sense of continuity and a source of identity. The historic environment is a social and economic asset and a cultural resource for learning and enjoyment.’
- 4.2 The government’s PPG 15 Planning and the Historic Environment 1994 states (paragraph 1.1) ‘It is fundamental to the government’s policies for environmental stewardship that there should be effective protection for all aspects of the historic environment. The physical survivals of our past are to be valued and protected for their own sake, as part of our cultural heritage and our sense of national identity. They are an irreplaceable record which contributesto our understanding of both the present and the past. Their presence adds to the quality of our lives, by enhancing the familiar and cherished local scene and sustaining the sense of local distinctiveness which is so important an aspect of the character and appearance of our towns, villages and countryside.’
- 4.3 It is clear from this that whole historic environments, such as the pattern of farmsteads on the boulder clay plateau, or the airfield layout, have their own value and require appreciation.
- 4.4 Paragraph 2.16 of PPG15 states ‘Section 16 and 66 of the Act require authorities considering applications for planning permission to have special regard to certain matters, including the desirability of preserving the setting of the building. The setting is often an essential part of the building’s character.’
- 4.5 The setting of the historic farmsteads on and around the appeal site relies on their relationship to the landscape, which can be affected by the introduction of alien elements such as flues.

- 4.6 Paragraph 4.14 states ‘Section 72 of the Act requires that special attention shall be paid in the exercise of planning functions to the desirability of preserving or enhancing the character or appearance of a conservation area. This should also, in the Secretary of State’s view, be a material consideration in the planning authority’s handling of development proposals which are outside the conservation area but would affect its setting, or views into or out of the area.’
- 4.7 The effect of the proposals on the setting of the Silver End Conservation Area is thus a material consideration.
- 4.8 Paragraph 2.12 states ‘It is generally preferable for both the applicant and the planning authority if related applications for planning permission and for listed buildingconsent are considered concurrently. It is unlikely that (authorities will be able to have special regard to the desirability of preserving a listed building or its setting) unless the planning application is accompanied by a listed building application.’
- 4.9 It is proposed that Woodhouse Farm become an education centre connected with the main proposal, but unless there is a listed building application submitted concurrently it is impossible to determine whether such a proposal would enhance or damage the listed buildings and their setting.
- 4.10 Paragraph 7.1 states ‘Regular maintenance and repair are the key to the preservation of historic buildings. Modest expenditure on repairs .. and routine maintenance.. can prevent much more expensive work becoming necessary at a later date.’
- 4.11 Clearly the lamentable state of Woodhouse Farmhouse and its

outbuildings exemplifies the poor custodianship of the present owners, and their lack of concern for the historic environment.

5.0 IMPACT OF THE PROPOSALS ON THE HISTORIC FARMSTEADS

- 5.1 Woodhouse Farm, the ancillary bakehouse/brewhouse and other outbuildings are proposed to be converted to an education centre. No listed building application has been submitted, so it is not clear whether such proposals would secure the retention and restoration of historic features of the buildings. In particular, floor loading and fire regulation requirements could make this an inappropriate use for the buildings. Nor is there a schedule of immediate remedial works to secure the survival of the buildings or any commitment to implement them. Additionally, it is not clear whether car parking, access and landscaping proposals might damage the immediate setting of the historic buildings or their relationship to the moat.
- 5.2 As explained in 4.5 above, the setting of the historic farmsteads should be regarded as including their relationship to the wider landscape as well as their more immediate surroundings.
- 5.3 The relationship of the Woodhouse Farm group to the waste management facility and the flue(s) is a very close one. At the moment the south westerly view is of trees and of the end of the vacant airfield hangar. This view would be replaced by a close view, within 200m, of the roofs of the sunken buildings appearing through the trees (obviously more visible in winter than in summer) and the flue(s) towering above. From this distance there would clearly be noise disturbance and possibly also smell. This is a complete transformation of the setting of this historic farmstead group, and is depicted in the Woodhouse Farm visualisations at Appendix D. It is noteworthy that at the 1995 Inquiry into waste disposal proposals at

- Rivenhall Airfield (albeit very different proposals from the present ones) the County Council submitted evidence arguing that the setting of Woodhouse Farm would be harmed.
- 5.4 The relationship of Allshots Farm, at some 400m, is also a close one. The damage to the immediate setting of Allshots caused by the existing scrapyard and other industrial uses would be exacerbated by the close view of the flue(s) of the waste management facility.
- 5.5 Herons Farm, some 900m north of the flue(s), is not a listed building, but is one of the historic farmsteads on the plateau. Its present open view of blocks of woodland would have the addition of the flue(s) and the roofs of the waste management facility buildings appearing through the trees. This is depicted in the Herons Farm visualisations at Appendix D.
- 5.6 Haywards Farm, at 1km. north east of the flue(s), is also unlisted but is one of the historic farmsteads. The view would be similar to that from Herons Farm.
- 5.7 Rook Hall, 1.8 km to the south east, is a former farm and a listed building. Though farther away, it has a direct view of the flue(s) through the gap between Storey's Wood and Upney Wood. This is an unwelcome addition to an otherwise completely rural view, and is depicted in the Rook Hall visualisations at Appendix D.
- 5.8 Porters Farm, 1.4 km to the south east, is a group of listed buildings. The present open view of blocks of woodland would suffer the addition of the flue(s) shown in the Porters Farm visualisations at Appendix D.
- 5.9 Parkgate Farm, 1.1 km to the south, is unlisted, but one of the historic

- farmstead groups. As with Porters Farm, the flue(s) would appear above the view of woodland from the opposite side of Kelvedon Road, as depicted in the Parkgate Farm visualisations at Appendix D.
- 5.10 Sheepcotes Farm, 600m to the west of the waste management facility, is a listed building. It has the former airfield hangar in close proximity and a radar mast at the rear. At the moment there is high conifer planting along the rear screening the farm buildings from the airfield, but should these be removed at some time, the flue(s) and roofs of the waste management facility would be visible within close proximity.
- 5.11 Goslings Farm, 1 km to the north west of the facility, is a listed building within view of the site, and would have a direct view, without intervening existing woodland, of the flue(s) and the roofs of the waste management facility. It is also likely to have a view of the access road emerging from its cutting within about 300m, together with the noise of lorries going to and from the facility.
- 5.12 Coggeshall Abbey, a manor house and former monastery, listed Grade I, lies some 3.5km to the north east. Representations have been made by the owner, supported by the technical adviser to the Historic Houses Association (see Appendix C) that the proposals would have an unacceptable visual and noise impact on the setting of the listed building.
- 5.13 The Polish Camp, though neither listed nor a farmstead, is a group of buildings with historic connections to the airfield and the wartime social context. Some 500m from the flue(s), its present wooded setting would have the addition of the flue(s) seen at close range, as depicted in the Polish Camp visualisations at Appendix D.
- 5.14 Whilst the views from historic building groups are important from the

aspect of their setting, a similar impact is sustained on the public using footpaths in their vicinity. In particular views from footpaths 7, 10, 31, 35, 52, 53, 54, 55, 56, 57, 68 and 81 would be affected, whilst footpath 8 passes within 50m of the flue(s) themselves.

6.0 IMPACT OF THE PROPOSALS ON SILVER END CONSERVATION AREA

6.1 Wolverton, one of the three managers' houses, is a listed building and one of the most important buildings in the conservation area. Its open view of woodland to the north would be compromised by the addition of the flue(s) and roofs of the waste management facility depicted in the Wolverton visualisations at Appendix D.

6.2 The proximity of the conservation area to the facility can be particularly appreciated from Sheepcotes Lane and from footpath 53, even though much of the conservation area has a wooded perimeter. There would obviously be greater intervisibility during the winter months.

7.0 IMPACT OF TRAFFIC ON HISTORIC BUILDINGS AND CONSERVATION AREAS

7.1 Evidence is brought in proof of evidence CG3 as to the congestion of the A120 and the additional traffic imposed by large numbers of HGVs proceeding to and from the waste management facility. This added

burden would be to the detriment of those listed buildings and conservation areas located along the A120, particularly, in this area, the Bradwell conservation area and 113-114 Coggeshall Road, The Cottage, The Swan Inn, Whiteshill Farmhouse, Baytree Farmhouse, Hunters Roost and the Dolphin public house, all on the A120 Coggeshall Road. This detriment could include noise, dirt, vibration and collision impact in the case of an accident.

- 7.2 There is no certainty that all the HGVs serving the site would keep to the A120. Failure to observe specified routes, SATNAV failures and police diversions or attempts by drivers to avoid congestion can all lead to HGVs using roads they are not supposed to, even those with weight, width or length restrictions.
- 7.3 The following roads and the historic buildings and conservation areas along them could all suffer from HGV diversions from time to time (see Appendix E):- Church Road, Hollies Road and Links Road (Bradwell), Boars Tye Road, Sheepcotes Lane, Western Road, Parkgate Road (Silver End), Park Road, Church Road, Oak Road (Rivenhall), Hollow Road, Church Hill, Church Street (Kelvedon), Lanham Green Road and Ashes Road (Cressing) and Cut Hedge Lane, Grange Hill and East Street (Coggeshall).

8.0 CONCLUSION AND SUMMARY PROOF OF EVIDENCE

- 8.1 The site occupies part of the boulder clay plateau which contains a network of historic farmsteads, one of which, Woodhouse Farm, is within the application site. It also contains what remains of the second world war Rivenhall Airfield, and lies close to the 20th century model village

of Silver End.

- 8.2 The listed buildings are of various ages dating from the 15th century onward and typically of timber frame construction with many original features. Their sites have been occupied from early times, with documentary evidence for Sheepcotes to 1137, Woodhouse to 1294 and Allshots to 1636.
- 8.3 English Heritage's Conservation Principles, Policies and Guidance 2008 and the government's PPG 15 Planning and the Historic Environment 1994 make it clear that the whole historic environment, not just the immediate settings of historic buildings and conservation areas, needs appreciation and protection. It also advises against proposals for listed buildings unaccompanied by a listed building application, and advocates regular maintenance and repair.
- 8.4 The fact that the proposed flue(s) and the roofs of the waste management buildings would be visible from many historic buildings, sometimes in an overpowering way, compromises their relationship to their landscape setting. This impact would also be readily experienced by users of footpaths in the vicinity. Proposals for the re-use of Woodhouse Farm raise many questions about their acceptability.
- 8.5 The proximity of the Silver End conservation area and its intervisibility with the application site would adversely affect the conservation area's landscape setting.
- 8.6 There would be an adverse impact on the historic environment from increased HGV movement on the A120. In addition, voluntary or involuntary diversions by HGVs on to minor roads could have a much

wider detrimental impact on villages and historic buildings in the countryside.

- 8.7 Because of all the foregoing problems, the Inspector is respectfully requested to refuse the application.