

WETHERSFIELD PARISH COUNCIL
REPRESENTING WETHERSFIELD, BLACKMORE END & BEAZLEY END



27 August 2019

Dear Julie O'Hara

Draft Wethersfield Conservation Area Appraisal and Management Plan (CAAMP)

Thankyou for attending the Wethersfield Parish Council meeting on 17 July which, as you know, was attended by well over a hundred local residents interested in this matter.

Further to your consultation letter dated 9 July 2019 and the meeting held on 17 July, I can now pass on to you the representations of the Parish Council. The Council asks that District Council officers consider these comments very carefully before a decision is recommended to Members because, as you know from the meeting, there are very strong and deeply felt feelings locally on this matter. Please let me know if the CAAMP is amended or passed to Members for a decision or whether the District Council would like to take up an offer to work more collaboratively with the local community on this important project.

The attached document 'Representations of Wethersfield Parish Council to the Draft Wethersfield Conservation Area Appraisal and Management Plan' is the Parish Council's initial response. The following draws out some of the salient points:-

- The Parish Council would welcome in principle, an appraisal and management plan which identified and addressed the need for positive measures aimed at preserving and enhancing the historic character and appearance of Wethersfield Conservation Area.
- Many of the measures in the management proposals are welcomed though the Parish Council notes the lack of analysis of the whole current designated area, the generic nature of most of the proposals largely based on existing district wide planning controls rather than measures specific to identified issues in Wethersfield, and an emphasis on the need for further future projects which may well be unlikely to materialize.
- The Parish Council objects strongly to the needless reduction in the existing designated conservation area by approximately two thirds. In the absence of reasoned justification, it does not accept that this is necessary or justified by changed methodology for undertaking appraisals or that there has been an erosion of the special qualities of the conservation since designation in 1973.
- The Parish Council does not accept that the existing designated boundaries are inappropriate and have been since designation. The designated area as a whole is a

distinct, highly attractive and coherent area of historic buildings and open areas which is in clear contrast to the surrounding arable landscape

- The existing designated area boundaries are rational and defensible based largely on the historic Manor Estate which has evolved over many centuries and still retains much of its historic character. The northern boundary is defined by a group of former farm buildings at Parsonage Farm which retains its historic plan form. Between Parsonage Farm and the manor is a gentle valley comprising an historic and attractive parkland and playing field which are important special features in the history of the village.
- The southern boundary of the existing designated area is marked by the crest of a long hill separating the village of Wethersfield from the Pant Valley. Like Parsonage Farm at the northern end, this point acts as a natural gateway into the village and is characterized by several important historic buildings and open spaces leading into the core part of the village all of which have strong historical associations with the village and Manor Estate. This is an entirely appropriate boundary to the conservation area and should be retained.
- The draft acknowledges the importance of the setting of areas proposed for deletion to the historic character of the village. This was recognized too in District Council decisions in relation to the Local Plan and planning applications. The Parish Council considers these areas to be of sufficient merit in their own right to be included in the conservation area but in any event should be included because of their importance to the historic setting of the village as a whole.
- There are a number of inaccuracies in the detail of text and there are other important matters that should be picked up in an appraisal such as the impact of overhead cables and poles, acknowledgement of important historic characters, other buildings and spaces in need of repair/attention, specific public realm enhancements.

The Parish Council hopes that you will consider these comments very carefully. Representatives of the Parish Council would be very happy to walk officers and Members over the area and discuss ideas for moving this work forward in a positive way. There is a considerable body of historical information held within the village records and no doubt this can be made available to you. Please let me know if you would like to take up any of these suggestions.

Yours sincerely,

Wethersfield Parish Council



P.P. Michelle Baker Wethersfield Parish Clerk

Julie O'Hara , Senior Planning Officer (Policy)
Braintree District Council

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Representations of Wethersfield Parish Council to the Draft Wethersfield Conservation Area Appraisal and Management Plan (CAAMP)

Introduction

The Parish Council would welcome a positive review and proposals for the preservation and enhancement of the Wethersfield Conservation Area as part of the statutory requirement to give special attention to the desirability of preserving or enhancing its character or appearance. This should draw attention to the significance and importance of the historic environment in Wethersfield, identify shortcomings and promote positive improvements.

The District Council itself has stated that the purpose of the current exercise to produce a Conservation Area Appraisal and Management Plan (CAAMP) is to analyse the area to inform future development and design with regard to the sensitivities of the historic environment and its unique character, identify issues it faces and recommend management proposals to address them. Although this is the first time that Braintree District Council has undertaken a review since designation in 1973, statutory protection has been successful over several decades in safeguarding and enhancing the historic character and appearance of the designated conservation area, including its open spaces largely through the efforts of villagers. There has been no reason to believe that this would not continue into the future.

Overall Parish Council View

The Parish Council (WPC) is disappointed that overall, far from focusing on substantial measures to preserve and enhance the character of the conservation area, the Council appears to be seeking to seriously and needlessly undermine it. There are some positive measures in the Management Plan such as preparation of a Heritage List, the need to address buildings at risk at Russells Farm and minor specific measures (such as forecourt enhancement and removal of the bus shelter) but most are either generic (such as tree management, working closely with the highway authority, seeking funding opportunities, enforcing breaches of planning control, promoting sympathetic development,) and based on ongoing development management controls or otherwise rely on the need for future further projects such as a Design Guide.

There are very few measures that reflect specific identified issues within the existing Wethersfield Conservation Area and there is little evidence in the document to underpin the assertion that that there is a need to 'ensure inappropriate development

does not continue to become the accepted norm’ or the reference made in 5.1 of the need to preserve the historic environment from ‘further deterioration.’ Although there are references in the CAAMP to a deterioration in the historic environment of the conservation area, little evidence is put forward which would allow specific issues to be addressed.

Despite the Councils’ declared aims of the work, by far the most significant proposal in the document is the reduction of the conservation area boundary by approximately two thirds in area by omitting much of the area to the south and east of the core built up part of the village. This embraces numerous important historic buildings and areas of beautiful and historic landscape closely associated with and an integral physical and historical part of the village as a whole.

Methodology

The expected methodology for a CAAMP is set out in Historic England guidance Advice Note 1 published in 2019 which sees an appraisal as the opportunity that ‘defines the special interest of the conservation area that merits its designation and describes and evaluates the contribution made by the different features of its character and appearance’. Yet the Place Services document is written as if the reduction in area has already taken place. There is virtually no attempt to properly analyse and review the areas proposed for deletion-it is as if they were never part of the designation. To say, as officers did at the public meeting on 17 July, that the current methodology does not allow such areas to be now included in a conservation area is factually incorrect. The recommended methodology in Historic England guidance for evaluating conservation areas (bearing in mind they are expected to be the subject of regular review) clearly expects all areas of a current conservation area to be particularised and appraised and included if its special qualities can be determined. This has not been done- the CAAMP analysis focuses primarily on the listed buildings in the village core (most of which are protected in any event) and much less so on the holistic value of the wider present designated area. The Parish Council strongly believes that an analysis of the whole designated area should be carried out before any consideration could be given to reductions.

The proposed reductions have emerged without proper analysis despite the intention that a CAAMP should be a positive exercise to strengthen the character and appearance of the conservation area and recent Historic England advice which acknowledges that boundaries are reduced only where special interest has been eroded. That advice is that boundary revisions might be needed where:-

‘The special interest of areas designated many years ago may be now so eroded by piecemeal change or by single examples of poorly designed development that parts of the area may no longer have special interest’. (para 105 Advice Note 1 2019)

This is not the case here. Contrary to Historic England advice the Council appears to have undertaken virtually no analysis to explain how the special qualities acknowledged and protected successfully over 45 years have been eroded by change to the extent that the conservation area should be reduced by approximately two thirds in area. Para 2.4 has a very short section justifying ‘Necessary Reductions’ ‘to reflect changing methodologies of good practice and provide a clearer strategy which

acknowledges the practicalities of Wethersfield's unique built environment . ' This is a nonsensical statement and does not explain in what respect methodology has changed and how there has been any loss of special character to justify wholesale reduction in area, let alone explain why this is necessary. The CAAMP should explain what the changing methodologies are so that villagers can comment on what seems to be a key point.

The area proposed for deletion

The Parish Council does not accept Place Services view expressed at the public WPC meeting (but not stated or explained in the CAAMP) that the current 1973 designated boundary is wrong and always has been. The currently designated area roughly corresponds with the Wethersfield Manor Estate forming a cohesive link between the manor, village services and cottages and surrounding farms and linked with the established and non-conformist churches. Taken with the so called '2019 Conservation Area', the areas proposed by the Council for deletion form part of this highly attractive, cohesive, well defined area of widely distributed, historic buildings and open landscape which is clearly distinguished from the surrounding open arable fields. Two photographs to illustrate this contrasting character is attached-one towards the eastern side of the village (right) and one towards the western side (left).



The area proposed for deletion have contributed to this distinctiveness over centuries by the presence of several historic buildings and their curtilage (many listed) from Parsonage Farm in the north to Sandhills and the cottages around Golden's Farm to the south. These are associated with a varied and beautiful historic landscape with many public views across it embracing extensive woodlands, nature reserve, water features, grazing and wildflower meadows, garden areas of historic buildings, manorial parkland, playing fields, reinforced by the undulating topography and vegetation all of which has a special interest . This lies within a natural and historic boundary of the Conservation Area and makes up its distinctive character in contrast with the surrounding areas of open arable farmland across which there are important views from within the existing designated conservation area..

Place Services appears to believe that individual open spaces should not be included in the conservation area unless strong historic association can be demonstrated. Officers have not only failed to properly particularise and assess most of the historic buildings and landscape value of the areas proposed for deletion but have not considered their

historic association with the village. Nor is there an assessment of the present designated boundary. The so called '2019 boundary ' is drawn fairly closely around built heritage assets around the village core and along Braintree Road as far as the former vicarage and much of the text is a description of designated assets in that area as already set out in the listing descriptions.

At the public meeting, Council representatives, claimed that the Council could more successfully defend threats from development to the open spaces proposed for deletion by demoting them from being within the conservation area to merely being part of the setting of the village. The Parish Council cannot accept this argument especially when it is known that developers have a current interest in developing some of these areas even to the point of submitting planning applications. Removal of statutory protection could not possibly strengthen the case for resisting unacceptable developments on those areas being deleted from the conservation area. This would be even more so during a period when there is not an up to date Adopted Local Plan and lack of five years housing supply.

Although the Place Services representative claimed at the meeting that the current designated boundary has always been wrongly drawn in his opinion, there is no explanation of this at all in the CAAMP let alone offered by way of any justification. In the absence of such an explanation, the Parish Council strongly contests this unsubstantiated assertion.

The eastern boundary at the northern end of the designated area is marked by the farmstead group at Parsonage Farm which has been recently carefully restored to an exceptional standard from a largely derelict state based on the historic plan form of buildings. This group has a very strong historical association with the village. It appears on the 1777 Chapman and Andre Map of Essex referred to as the 'Parsonage' . It was included in the 1840 Tythe Map, particulars of the sale of 'The Manor House Estate' in 1877 and there is a considerable record of its social history and significance to Wethersfield village. A proper analysis in the CAAMP would have revealed that the present group of buildings shows a remarkable correlation with its historical arrangement of buildings. Moreover, this group of buildings marks an important ridgeline when approaching the village from the east and acts as a 'gateway' when arriving in the historic part of the village.

Parsonage Farm defines the eastern edge of the gentle valley occupying the area between Hedingham Road and the manor. This area is distinct from the arable land to the east by its parkland character which is reinforced by its use as grazing land. This too is a heritage asset which contributes very significantly to the conservation area and this too deserves to be particularised and properly appraised. The playing field was gifted to the village from the manor owner after the second world war as a memorial to his son, killed in battle so this area too has important local historical associations. Taking these areas as a whole, the designated boundary in this part of the village could not reasonably be shown to be 'wrong 'and there is absolutely no justification to remove it from the conservation area which would serve no useful purpose in the protection of heritage assets.

At the other end of the conservation area, the Parish Council considers the designated south boundary of the conservation area to remain appropriate, logical and justifiable. There is no justification to arbitrarily sever the conservation area at The Vicarage as proposed given the immense heritage value of the area proposed for deletion between The Vicarage and current designated area boundary to the south. This area too formed part of the Wethersfield Manor Estate. The southern boundary of the designated conservation area is marked by the crest of a long hill which Wethersfield village from the Pant Valley and Shalford beyond. This crest marks a gateway into Wethersfield village which provides a strong sense of entry into the conservation area with several historic buildings straddled along the road from this point leading into the core of the village and set within a beautiful and historic landscape of gardens and open spaces. That includes the Goldens Farm complex, Sandhill cottages and open areas which once formed an important part of the Manor Estate.

Taking the proposed area for deletion south of The Vicarage, the proposals involve an arbitrary boundary through former glebe land attached to the vicarage itself and separated from the Goldens Farm complex by an important historic route to the river meadows which still remains and was known to have existed since the 1300's. This was called Motonslane in the 1300's whilst in 1632 it was known as Muttons Lane and fronted by three dwellings from mediaeval times. This route was an important link to the River Pant and provides another exceptional viewpoint across the valley which along with many other important viewpoints within the area proposed for deletion is not recorded in the CAAMP.

To the south of this byway, is the Goldens Farm complex where many of the buildings are important and listed and of considerable and acknowledged heritage value with a very important historical link to the village. The word 'Goldens' is a corruption of the name Golding-Edward Golding was recorded as living on the site in 1276. In 1468 tenure was granted to John Herward and his wife Alice-she was a wealthy aristocratic widow who held several areas of land which became part of the Manor Estate. Her grandson Richard died in 1559 leaving Goldens and other properties in a charitable trust for the benefit of the poor of Wethersfield. This is recorded inside the door of Wethersfield Church where two shillings were dispensed to poor people every Sunday. This continued for over 300 years. In 1486 Richard Herward Snr leased Goldens to his brother with instructions to repair the Hall and rethatch all the buildings, build an oast and grow hops on the opposite side of the road. In 1726 the tenant was required to plant 30 ash trees for hop poles and the importance of hops in the village may well have led to the establishment of a brewery at Wethersfield. The area opposite Goldens became important to the Manor Estate including the lake which still remains. This had an early hydraulic ram to supply water to the house and laundry (Carol Cottage). Other buildings in this area are unlisted but of clear heritage value such as the cottages at Sandhills, which is believed to have housed workers linked with the brewery in Wethersfield built around the same time.

The Parish Council considers very strongly that this southern part of the village is of immense historical value as well as an integral, attractive and important contributor to the character and appearance of Wethersfield village and again, in

contrast with the arable farmland immediately adjoining the conservation area. In many instances, areas proposed for exclusion are attractive areas of open space sitting between or within the curtilage of listed buildings. It is a folly to suggest these buildings are protected as listed buildings and thus need not be included in the conservation area—they are historic buildings within a beautiful historic landscape as part of a wider coherent and distinct area, inextricably related physically and historically with the village, all of which continues to be of special interest. Again, there is no reason why they should suddenly after 45 years, be excluded from the conservation area on the basis that the designated boundary is ‘wrong.’ The Parish Council believes the designated boundary is appropriate and justifiable and that there is nothing in guidance, policy or legislation that would override this reasonable conclusion. If Place Services disagree with this assessment then the CAAMP should explain its reasons and the public be invited to make representations on this point too.

Setting of heritage assets

Paradoxically, even the document seems more positive than not about areas the Council proposes to delete. Para 2.4 of the document explains that the area south of the manor ‘makes a positive contribution to the wider setting of the conservation area’; the playing fields value ‘is drawn from the contribution it makes to the conservation areas significance by forming an important part of its setting, enhancing the way in which it is experienced, understood and appreciated’; the area around Goldens Farm ‘remains an important part of the historic environment making a positive contribution to the wider setting of the conservation area; para 3.1 refers to ‘The special interest of Wethersfield is derived mainly from its historic settlement pattern, which is still discernible in the existing landscape; the ‘open manorial and farm character to the south also contributes to its character. The Parish Church of St Mary Magdalene and The Manor House are located on high ground, on either side of the valley; this creates intervisibility between the two, and creates views from within and towards the conservation area’; para 3.1 refers to an area to the south of the village core where ‘wide areas of open landscape form a significant feature of the conservation area. These fields and manorial grounds are reflective of historic land use, and have been retained to the south of the conservation area.’

These comments suggest that these areas are important to the character of the conservation area and contribute to its special interest so their deletion is baffling. Officers have said (but not documented in the CAAMP) that whilst important to the setting of historic buildings in the village, these spaces need to have a strong historical association in their own right to justify inclusion in the conservation area. The CAAMP does not analyse these areas to explain why this is not the case. But as asserted above the Parish Council considers the current designated boundaries to be appropriate and justifiable and areas shown to be deleted do indeed have strong historical associations with the village. Even so, their acknowledged importance to the setting and character of the remaining historic parts of the village is a sound reason to continue to include them in the conservation area because they contribute very positively to its special interest.

Despite officers assertion (again orally but not particularized in the CAAMP) that

regulations and advice lead to the need for these areas to be removed from the conservation area there appears to be nothing in the most recent Historic England advice or in NPPF that would support this approach. Stripping away statutory protection of conservation area status cannot sensibly be said to give the areas proposed for deletion more protection. Council proposals would defy the purpose of conservation area designation to protect heritage assets and their setting and that applies to this distinctive and special part of the rural Essex landscape. That would leave them more vulnerable to the development pressures seen in recent times, heightened in this district where there is no up to date adopted Local Plan.

Stripping areas of protection now will send developers a message that these areas are now given less weight by the Council for their heritage value, signaling an invitation to submit damaging proposals in future including during the current period when there is no up to date Adopted Local Plan.

Planning application and Local Plan

This work on this CAAMP follows on immediately from two decisions taken by the Council in 2017-one to refuse planning permission ref (17/00017/FUL) for housing development on open land south of Hudsons Hill and the other to omit two housing sites on open land (ref WETH 624 and WETH 636) from the Submission Local Plan. In both instances the positive contribution of the areas to the character and appearance of the conservation area weighed heavily in the decisions taken by the Council.

In the case of the refusal of planning application 17/00017/FUL the officers report recognized the qualities of the open landscape within the conservation area in stating that ‘Heritage assets and landscapes and their settings contribute to character but it is a broader concept, often used in relation to entire historic areas and landscapes. It also states that a conservation area will include the settings of listed buildings and have its own setting, as will the village or urban area in which it is situated.’

Moreover, the LPA took account of its heritage advice from Place Services, which stated that:-

‘A defining feature of the Wethersfield Conservation Area is the landscape setting of Wethersfield which has remained unchanged over the centuries and contributes significantly to the character of the area.....To date the rural setting of Wethersfield has been retained to the South with long distance views outward. This makes a significant contribution to the character of the conservation area and should be retained. ‘

This approach is consistent with Historic England’s advice (Conservation Area Appraisal, Designation and Management Advice Note 1 (Second edition)) which states that

‘Heritage assets can gain significance from their relationship with their setting whilst views from within or outside an area form an important way in which its significance is experienced and appreciated. This part of the appraisal should identify how the landscape that the area is located within contributes to its special interest.....’. (para 58- 59 Advice Note 1 2019)

There are no reasons set out in advice which would discourage areas being included within a designated conservation area boundary where they clearly contribute to the

special interest of a conservation areas through its setting to heritage assets. That after all, is a reason why conservation areas were established in the first place. In any event, as demonstrated above, the areas proposed for deletion in the CAAMP not only enhance the setting of heritage assets but also have heritage value in their own right.

Viewpoints

Several key public viewpoints across the currently designated area, such as from the playing field; from the east across the ‘gateway’ complex of historic buildings at Parsonage Farm; along Braintree Road, public footpaths around the edge of the existing conservation area would be lost to the conservation area as a result of the proposals. However, these viewpoints are not analysed or referred to at all in the document and the numerous photographs in the document include virtually none of the areas proposed to be removed from the conservation area. One photograph is offered on page 21 purporting to be a view of Manor Park in 1988. However, this appears to be a view of the landscape outside of the conservation area and it is unclear how this supports the Council’s view that there has been a ‘significant change in land use and loss of original parkland features’

Changes since Designation

Oblique justification to reductions is given in the descriptive material of Character Area 3 :-

‘While the Manor House has retained its formal gardens to the south the wider landscape has been put back to arable use, and is no longer discernible as parkland. Therefore, while it is not worthy of inclusion in the conservation area, it is important as the setting to the Manor House and Conservation area.’

One can only assume that the area has not been inspected on the ground because this is incorrect. It is not in arable use and maintains its long established parkland character. As was recognized by Place Services in 2017, there has been virtually no change for centuries and certainly not since designation.

In fact, the established character has been strengthened by recent refurbishment at Parsonage Farm on the eastern edge of the existing conservation area, building renovation at Brook Farm, high standards of maintenance throughout, increased animal grazing and reduced arable farming, parkland fencing and recent conversion of adjacent arable land to a wild flower meadow. Contrary to the Council’s sole justification for boundary change, there is barely any arable land in production at all in the conservation area which retains its historic character distinct from the surrounding and much changed arable landscape.

An inspection and proper survey on the ground (rather than by desktop digital mapping) would reveal that in spite of recent development pressures, the extensive areas indicated for deletion by the Council have remained unchanged and still retain special qualities that are closely integral to and inseparable from the overall character and appearance of the conservation area. As explained above, these areas clearly have special historical and architectural qualities in their own right but taken with the scattered historic buildings throughout the conservation area the associated open areas make crucial contributions to the character of the conservation area as a whole and close associations with the Manor Estate.

Other comments

There are matters in the detail of the document that would need to be addressed:- for example, several errors of fact-Trodds Garage and John Pease left the village decades ago; the bus shelter is not a bus station; the URC closed many years ago; reference could be made to significant historical figures such as Captain Charles Clerke at Brook Farm and Patrick Bronte; reference could be made to the adverse visual impact of overhead cables/poles in High Street; reference could be made to other buildings in need of enhancement and some of the neutral buildings in High Street, areas proposed for removal from the conservation area and thus not considered in the draft such as Sandhills and Parsonage Farm and buildings around the village green, High Street and Dog Chase might be considered for the Heritage List.

Way forward

The Parish Council will be considering preparation of a Neighbourhood Plan in coming months. This would focus on the specific needs and characteristics of Wethersfield. There should not be any needless conservation boundary changes ahead of that consideration. The Parish Council consider that a review in partnership between the District Council, Parish Council and local community, whether or not part of the neighbourhood planning process, would be the right way forward if a management plan is to have the collective support needed to ensure successful implementation.

Place Services seem to have focused on an assessment of built heritage assets in and around the village core, any appraisal should be based on an on the ground assessment of the whole current designated area and as well as built heritage assets should include landscape features, topography, enclosures, use of land, relationship of open space and built development, wildlife, public/private viewpoints, contribution to the setting of heritage assets, historic associations with the village and assess these against any changes since designation Positive proposals to protect and enhance these areas by addressing identified issues could then be put forward and only deletions suggested where it can be clearly shown that longheld special physical and historical qualities do not exist or have been seriously and permanently lost over time.

27 August 2019