

SMD/2021/0610
Land East of Froghall Road, Staffordshire
Up to 228 Dwellings

Response from Conservation and Design: Mel Morris, BA Hons, Dip. Arch. Cons, IHBC, MRTPI
on behalf of Staffordshire Moorlands District Council
19th December 2021

Summary Conclusions

The Heritage Statement submitted with the application has concluded that there is the lowest level of 'less than substantial harm' from the proposed development. I don't agree. There are a few key elements of the applicant's assessment which appears to define the setting of the listed building narrowly, ignoring the important approach route to the farmhouse along Hammersley Hayes Road and not looking at the farmhouse in the wider context of views from the south-east. The Heritage Statement concludes that the proposed planting "prevents visual coalescence". In my view it creates visual coalescence and it will remove its sense of isolation. The setting of heritage assets is considered under GPA3¹ and the NPPF in its definition of setting. It is a concept which requires expert professional judgement.

My assessment is that with the red line abutting the curtilage of the listed building and the new landscaping proposed in the application, the level of harm to the setting of the grade II listed farmhouse as proposed is currently high on the 'less than substantial harm' scale (paragraph 202 - NPPF). The scheme proposes planting to mitigate the impacts, but the planting is by its nature alien to the open setting and the isolation of the listed building.

The Heritage Statement concludes:

"It is considered that the level of harm generated by the proposal to the asset, through loss of context, is to a degree mitigated by the reinstatement of the historic treed environs of Broad Haye Farm and is consequently at the lowest level of less than substantial harm."

Firstly, in my view, this is not 'loss of context', it is technically impact on setting, how the heritage asset is experienced, and not something as remote a concept as context. That is clear from GPA3.

Secondly, there are no 'historic treed environs'. The farmhouse sat within an open agricultural setting and was raised on its plot in order to be seen. The few trees in the vicinity were trees lying within field boundaries which were regularly spaced, as found within landscapes of late enclosure, and a few orchard trees to the north. That remains its setting. Its very visibility in the critical approach route from the south and its presence in the views from the south-east (see the LVA Viewpoint Photos 8, 9 and 10) are important parts of how we experience it and its significance. The proposed development will completely curtail this experience from the approach road, so that from this direction it is experienced at very short range. In my view the proposal is transformative to the setting of the listed building, with a high level of harm.

I also have concerns about the potential impact on the visibility of the Grade I listed RC St. Giles, Cheadle, and its significance as a local landmark in views from the north. There has been no assessment of these in the submissions and so that remains in doubt. I have set these concerns out below.

In my view the scheme should be aiming to preserve the sightline of the listed building (Broad Haye Farm) from the approach route along Hammersley Hayes Road (see my annotated plan on page 7). The openness of the setting and views of the building from the road should be protected. The proposals incorporate an area of planting alongside the building and Parcel 2d is too close, clipping (and urbanising) the key view along the approach lane. As a result, one will only start to appreciate the listed building from a close range, and this distances it from its agricultural setting. The proposed 'orchard' simply serves to draw the development visually closer. Screening the development from the listed building is, in my

¹ Historic Environment Good Practice Advice In Planning Note 3: The Setting of Heritage Assets (Historic England, December 2017)

view, not the correct way to approach mitigation. The sightlines I have overlaid define a reasonable-sized paddock to the west of the listed building to preserve the sense of isolation. This will not fully mitigate the impact and harm, but it will reduce it. Further 'transitional' planting on the edge of the development beyond the sightlines I have identified, will reduce the impact further.

At present the proposal is harmful in my view because it removes the listed farmhouse from its open setting to the west and encroaches onto the principal view. In views from the east (see LVA VP8 and VP10) the development will also have the effect of encroaching onto the setting of the listed building so that it becomes effectively conjoined to the edge of Cheadle, rather than being seen as a detached isolated farmstead.

Significance of the Grade II Listed Building – Broad Haye Farmhouse

The listed building (UID 1374681) is a distinctive farmhouse. Built as a three-storey farmhouse around the turn of the 19th century, it is a rather typical farmhouse of this period and this region. I suspect it may have been connected to the enclosure of the land. It has an associated farmstead and it derives some significance from the historic connection of the building to the farmed and open agricultural landscape. That was its purpose and it continues with that today.

It is a large and prominent farmhouse built of brick with a dentilled eaves band, all now painted and a blue clay tiled roof. It has segmental brick arches to ground and first floor, with flat lintels to the attic floor. The house adopts the classical proportions of farmhouses within the Midlands, influenced by the principles of Georgian building, symmetry and the golden section, but without the grandeur or formality of sash windows. Stylistically it has characteristics that we find in the mid 18th century but for that date we might expect to see brick banding.

Location and Contribution of Setting to Significance

The grade II listed farmhouse sits just above the 175-metre contours and the ground rises to the west towards the A521 at 190 metres on the edge of the application site. It is notable that the farmhouse lies within an open landscape. Hedgerows with trees planted at regular intervals appear to be the remnants of this late enclosure field pattern and it is typical to see hedgerow trees within an enclosure landscape. The style and origins of the listed farmhouse also suggests a late enclosure farmstead.

The Tithe Award provides information about the occupier of 'Broad Hay' Farm, James Fallows, and the farm holding is relatively large for the region, signifying a good-sized farm. The Fallows family are associated with 'Broad Hay' in the early C19. The land to the immediate west of the listed building, which incorporates the greater part of the application site (Plot 497 'Big Meadow' in the Tithe Award), is in the same ownership as the farmhouse, so is part of the agricultural holding and farm associated with the listed farmhouse at this date. In terms of ownership and occupation, therefore, a large part of the application site is part of Broad Haye Farm.

The approach to the listed building from Hammersley Hayes Road is the principal approach. This is illustrated in plate 2 of the Heritage Statement and in my photos. This is how it was always intended to be seen and experienced. It is not an outward designed view, in the sense that the building does not overlook the fields to the west, but it is still a conscious arrangement as this roadway has the farm as its primary destination and a focal point of the view. The Tithe map does not show the road or lane network very clearly but it is picked up very clearly on the 1837 OS 1-inch draft map (British Library - Henry Stevens surveyor; 1837), one leading along the route of the public footpath to the east (Cheadle FP 40) and one to the north, which is shown on the 25-inch first edition OS map as a footpath tracking the field boundary (1880). The roadway from the south comes from Donkey Lane, as shown in 1880.

In the views along this principal approach the building stands out, in part for the rendered elevation, but also because the listed farmhouse stands on slightly raised ground. The western flank walls and rear wing are relatively plain, but have a large presence.

The farmhouse looks across the landscape towards Cheadle. The HS recognises that the house was designed as an 'eyecatcher' in certain views, but completely ignores the views from the approach road along Hammersley Hayes Road, which are the primary and most immediate views that we get of the farmhouse.



Extract from the 1837 first edition OS (Surveyor's draft - Henry Stevens, British Library)

The field to the south is shown unfenced (a dotted line on the 1880 OS map) along the edge with the approach road and this is still the case. This open arrangement increases the sense that the aspect from the farmhouse was a designed or deliberate view and likewise the approach road. This includes the land to the south of the application site. The landscape is open with a number of dispersed farmhouses and farmsteads visible within the valley. They draw some significance from their shared agricultural and open setting.

From the Tithe map onwards the field parcel to the west of Broad Haye Farm is shown in the same form until 1988. Although farm holdings do fluctuate in that they both grow and shrink, this does not predetermine whether the land forms part of the setting. It needs a more tangible relationship than that². The closer one gets to the listed building, the stronger and more tangible the relationship becomes as this is clearly the surroundings in which the listed building is experienced. By contrast, the land to the western part of the field in the application site, where it adjoins the existing housing alongside 162-204 Froghall Road does not, in my view, make a positive contribution to the setting of the listed building. There are significant differences across the application site according to the lie of the land and the visual relationship.

There are glimpsed views of Broad Haye Farm from the A521 for a considerable distance along the length of the road. These kinetic views are incidental and the building does not derive a large amount of significance from these views, even though some of the land was in the same ownership. It is more limited in how we experience the listed building from Froghall Road. Some of these initial views will still be preserved as the development does not eliminate them all.

2 High Court Judgment - [2018] EWCA Civ 1697 - Catesby Estates Ltd. and Peter Steer and Historic England. "Implicit in section 66 of the Listed Buildings Act, however, is that the setting of a listed building is capable of being affected in some discernible way by development.(para. 24). if a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two - a visual relationship which is more than remote or ephemeral, and which in some way bears on one's experience of the listed building in its surrounding landscape or townscape (para. 25). This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building's setting. But the historic connection could not be the sole criterion for judging whether a site lay within the setting of the listed building. Land historically farmed within the estate as a whole, and belonging to that social and economic entity, might be so geographically detached from Kedleston Hall as to be "completely remote." (para. 39).

Planting and Trees

There is an overgrown and unmaintained hedge to the immediate west of the listed farmhouse but not any form of planted shelter belt, formal screening or copse planting. In most views this hedge has a very limited role in providing any form of screening and does not contribute to the significance of the listed building.

The Orion Heritage Statement states,

“It is also clear from the historic mapping that there was historically a high level of tree screening to the boundary of the farmstead and orchard planting to the rear. The present day open nature of the wider environs does not therefore represent the historic character of the setting.”

I don't agree and there is no evidence for this on the historic mapping. The HS also refers to the scheme as restoring “the historic context of greater tree-planting”. Again, this is not the case. Whilst plantations and woodland are illustrated on the Tithe maps, none are shown around ‘Broad Hay’ farmstead. The 1880 OS map shows a very small orchard to the immediate north of the farmhouse. This is quite typical of local farmsteads, which often had a small cluster of damson trees. Otherwise, the trees shown are those which fall along the field boundaries within the hedgerows, so are dispersed. There is no plantation, no shelter belt, no woodland or copse near the house. The farmhouse sits within its landscape just as seen on these maps, with very little change.

Viewpoint Photos

The LVA includes VP photos. In general they are representative with a couple of exceptions I wish to make comment on as they are looking into the site rather than across it obliquely. Viewpoint 4 and 4A seem appropriate to me. VPI is in the right location but clips the listed building from the view. This is, therefore, in my view unhelpful (see my photo from the same location on page 9) and the view should be more honest and include the LB by standing slightly further back, as evidenced in my photo. There is no view along the roadway approaching the listed building. VP No. 2 is close but looking away from the listed building. This is an omission. Please see location and direction of view which I consider should be modelled on page 10.

Apart from these local views, which take in the site and the listed building, there are no omissions which relate to Broad Haye farmhouse.

Comments on the LVA and Photoviewpoints (ref. Landscape and Visual Appraisal – FPCR November 2021)

Photoviewpoints 8, 9 and 10 clearly show the site in relation to the front elevation of Broad Haye Farmhouse from some distance. The proximity of the site and the development will remove the farmhouse from its isolated position, which it shares with other farmsteads scattered across the landscape.

Although the site is flagged in the LVA there is no direct analysis of impact on the listed farmhouse and it is not identified as a sensitivity receptor in Appendix C or anywhere else. In the absence of this being identified as a receptor in the LVA, I would expect to see this addressed in the Heritage Statement. The HS should be assessing the views of the LB from some of the same viewpoints, as well as any additional relevant ones which incorporate the setting of the listed building, including the ones I have identified.

With regard to VPs 9 and 10 the LVA identifies “Users of footpath Cheadle 38 and 39 and states: “The context of the view is of settlement edge character and although the development abuts eastward reducing the space between Broad Haye Farm and Cheadle, the visibility of the development is partially assimilated into the northern boundary of Cheadle. Additionally, consideration of the sensitive eastern edge has been reflected in the layout. It proposes a buffer area to the east of the Site, with an area of Public Open Space to the South. The provision of planting and open space will help soften visual changes experienced along this PRow.”

The concluding impact is identified as ‘the visual effects are judged to be Moderate/Minor Adverse.’ That relates to the receptors but not to the listed building. The impact on the listed farmhouse in these views has to be greater than that as the openness will reduce over time. The landscape architects refer to ‘a broad landscape buffer’ (para. 5.3) and dense planting (screening) and the creation of an open green as mitigation and the assimilation of the development with the edge of Cheadle but in my view this is not mitigation because it is intrinsically inappropriate in the context of the setting of the listed farmhouse. The use of a ‘transitional’, planted ‘green wooded edge’ is alien and unrelated to the openness and simplicity of the agricultural landscape. What would mitigate the impacts is detaching the development entirely from the farmhouse and providing a high degree of visual separation so that we can actually see the building in its open farmed landscape setting.

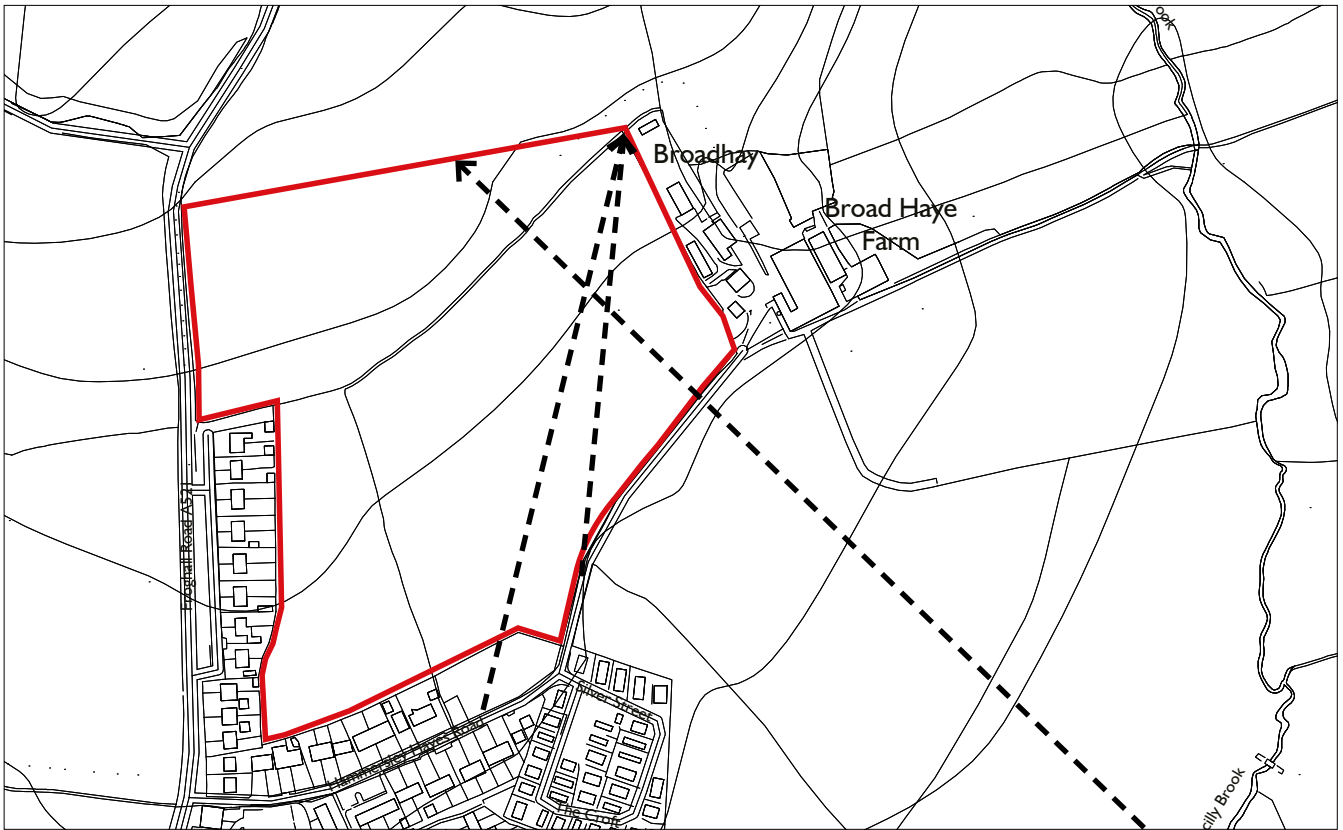
Paragraph 7.9 of the LVIA states “The proposals include carefully considered design measures and landscape strategies to minimise the level of adverse effects on landscape character and visual amenity, particularly along the eastern boundary.”

I disagree with the whole of the design approach to this eastern area. In my view it should be either (and preferably for land management reasons) outside the red line and maintain visual separation in the form of a paddock, or, if inside the red line, it needs a completely different strategy to ensure that any attenuation and open wildlife meadow is seen as a natural extension of the agricultural landscape and to protect the principal views of the listed building along Hammersley Hayes Road. Notwithstanding this, I am also of the view that Parcel 2d is too intrusive and shortens and urbanises the views of the listed building.

Views of St Giles Church

St. Giles RC Church (1841-1845 – Grade I – AWN Pugin) which lies almost due south of the application site is visible from a considerable distance, as far away as Ipstones (at 5 kilometres). In my opinion, it derives considerable significance from these very long distant views. Pugin, the architect, was very aware of the nature of the medieval church and how historically the spire was a spiritual landmark. He set this out in his ‘spires’ diagram for ‘Contrasts’ (1836) and his 1841 manifesto ‘True Principles of Pointed or Christian Architecture’, the seminal publication on Gothic Revival architecture, in which he said, “Every tower built during the pure style of pointed architecture either was, or was intended to be, surmounted by a spire, which is the natural covering for a tower..... when towers were erected with flat embattled tops, *Christian architecture was on the decline*, and the omission of the ancient and appropriate termination was strong evidence of that fact.”

Pugin wanted spires for most of his churches. In the end he was successful with very few, St. Giles Cheadle being the most notable. At 61 metres to the tip of the spire it is one of the tallest spires of any church in the region. Views of this spire from the surrounding countryside are also important to local people for their sense of place. Land in the ownership of the Earl of Shrewsbury to the east does not

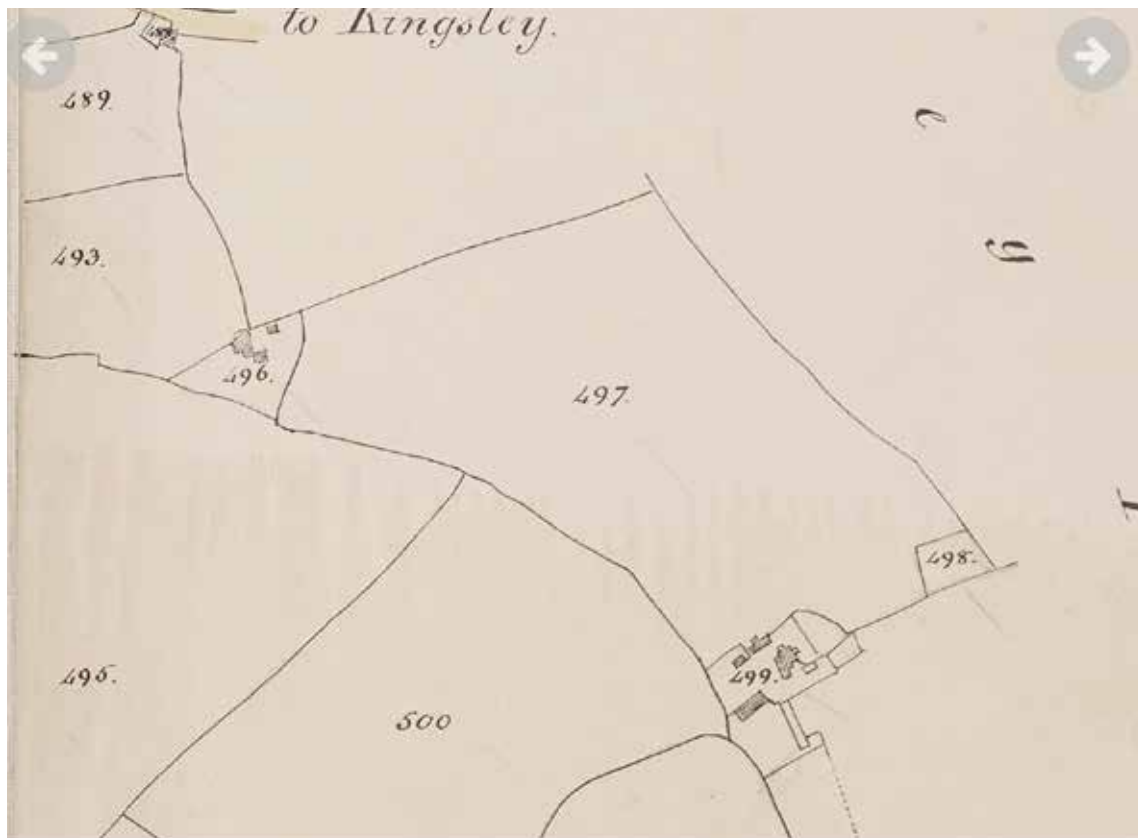


Diagrammatic alignment of views from key locations along approach road and key locations to the south-east.

have that visual connection and it is notable that the landform reduces its visibility from the east, south and west so that its main presence is felt from the immediate bowl of Cheadle and from the north. Its spire, at 61 metres, is exceptional in North Staffordshire and it was deliberately designed to have this visibility from the local area. Any development which reduces its visibility from the wider area, in particular from the north, as a nationally important listed building, and as a regional 'gem' and a major attraction, **should be a cause for concern**. It is different from the majority of churches where the HE guidance (GPA3) states that "an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view". Whilst we probably cannot categorically show that Pugin considered specific views in the wider landscape, we do know that he moved the tower, so that the spire would be a striking endpoint from Cross Street. This, and his awareness of the impact of the spire and his various publications, makes this circumstance different and in my view this church derives some of its significance from this iconic relationship with its presence in the views from the north.

The scheme has not identified whether there is any reduced visibility of the spire from key high-level locations to the north of the town. I have included a very basic Google Earth Pro Viewshed analysis (on page 13) showing the theoretical visibility of the spire. This gives us some context and will need more accurate modelling but it does give me some cause for concern. The application site lies on rising land which has a local high point of 202 metres AOD just to the north. In my opinion the view of St. Giles Church spire from some key locations, which may lie several kilometres away, should be modelled in the context of the proposed development. This includes Ipstones, Kingsley, Kingsley Moor, Kingsley Holt and Whiston. We don't know at this stage, to what extent the views of the spire might be affected by the development on the rising ground, whether this is going to be more local or have no effect. At present, development on the northern edge of Cheadle does not interrupt the views but the contours are rising to the north and building out may have a significant effect. Relative heights of new development may be critical. I appreciate that in outline form and as an outline application, without overall building height parameters, this may be difficult. I do, however, need to flag this up.

ILLUSTRATIONS



Extract from the Cheadle (Cheadle Quarter) Tithe Map showing plot no. 497, 'Big Meadow', plot 498 'New Garden', and Plot 499 'House and Garden', all Broad Haye Farm.

Below - list of entries and occupiers in the Tithe maps

Kingsley

665 – James Fallows, 'Wheat Field', owner James Beech

664 – Bennett Fallows, 'Upper Broom Field', owner James Beech

666 – James Fallows 'Homestead and Land', James Beech

Bennett Fallows occupies a considerable farm landholding in Kingsley parish.

Cheadle

497 – James Fallows ' Big Meadow', owner James Beech

499 – House and garden", James Fallows, James Beech

498 – 'New Garden', James Fallows, James Beech

James Fallows occupies a considerable farm landholding in Kingsley parish and some in Cheadle as well.

500 – Near Broad Hay, James Fallows

495 - Far Broad Hays, James Fallows



First approach view of Broad Haye Farm from Hammersley Hayes Road



Broad Haye Farm - key focal point of view. The openness and view should be protected.



location of viewpoint below



Hammersley Hayes Road - view towards the listed building, Broad Haye Farm and its farmstead. Field boundary to the right and lamppost to the left behind the camera. Cattle grid in the foreground on the lane.

This key approach view of the farmhouse within its farmstead is the minimum level of openness which should be retained without causing a high level of harm to its setting.



View of Broad Haye Farm from the approach road. It is seen obliquely across the immediate field to its west, part of the historic farm landholding (part of the application site). Development or trees which remove this view or significantly encroach on this key view will remove its sense of isolation as a detached regional farmhouse lying within a farmstead at the heart of an agricultural landscape. This setting is part of its significance.



Front elevation of Broad Haye Farm within its farmstead.



Glimpse of Broad Haye Farm and other farmsteads from Froghall Road. White or cream painted farms are highlights in the landscape.

St. Giles RC Church, Cheadle - grade I listed building. This view is from Cross Street. The spire is 61 metres (200 feet).



Google Earth Pro - viewshed of St. Giles spire (at 61 metres above ground level). This reveals limited visibility to the south and east of the town beyond the 'bowl' whilst extended visibility to the north.

