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Trust**

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**WSSC/004/20, consultation response to additional information submitted April 2021**

Restoration of the former Standen Landfill site with a woodland and pasture landfill cap system

Evergreen Farm, West Hoathly Road, East Grinstead RH19 4NE

Dear Chris Bartlett

I am writing in response to the additional information supplied by the applicant in reference to application WSSC/004/20, at Evergreen Farm, and your invitation to submit further comments.

The National Trust supports the changes made in the Transport Assessment with regard to the entry and exit arrangements to the proposed site, and the adoption of a single in/out arrangement via Beechcroft. It is noted that this obviates the need to use the Standen entrance for any lorry movements or other access to the site, for the purposes detailed in the application.

We are however disappointed that the applicant does not appear to have revised the application red line accordingly to take account of this change. As there is no longer any need for the application to use or cross any National Trust land and its access to and from its Standen site, it is considered that the red line boundary should be amended accordingly.

Should the red line remain unchanged, and notwithstanding this technical matter, it is requested that should the Authority be minded to approve the application that a condition be included to restrict the use of the Evergreen Farm track to its lawful use for agricultural purposes only and to prevent any use by construction traffic or other traffic / access associated with this application. It is noted that the previous applications for the use of Evergreen Farm as landfill in the past, had included similar conditions to restrict the use of this track and access via the Standen driveway.

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The National Trust does have continuing concerns with regard to the transport statement and the routing of the lorry movements to and from the site, both in general terms, and specifically in regard to the impact on our Standen visitor attraction.

With regard to the Standen visitor attraction, it is noted that the transport statement summarises the lorry movements along the West Hoathly Road from Beechcroft towards Saint Hill as follows;

Using the basis of first principles, the proposed restoration of the former Standen Landfill site with woodland and pasture landfill cap system will result in 12,000 to 15,000 annual HGV deliveries, resulting in 24,000 to 30,000 annual tips. This annual forecast amounts to approximately 31 daily HGV deliveries, or 62 two-way daily HGV trips throughout the 80 week operation period. This forecast amounts to approximately 3.1 HGV trips per hour throughout the sites weekday operational hours.

This implies that there will be 3.1 HGV trips per hour, but it also states that there will be 31 deliveries or 62 two way trips, which in common understanding implies over 6 two way trips per hour. The number of trips, both ways, along the West Hoathly Road should be clarified and clearly stated as this summary is confusing and apparently inaccurate. On a simple calculation of 62 two way trips a day, with an 8-10 hour operating window, results in 6 lorry movements every hour, or 1 every ten minutes. The applicant and the Transport Assessment should clarify the number of lorry movements along the route, daily and per hour in both directions, as at present this is not clear.

On the basis of 6 2 way trips per hour, the National Trust do not consider a heavy goods vehicle moving at low speed along a narrow country lane once every ten minutes to be a negligible impact, or a small increase in traffic flows, as stated by para 6.7 of the Transport Assessment;

6.7 As Table 6.3 and Table 6.4 above demonstrate, the forecasted HGV trips associated with the development will result in a small increase to traffic flows on the local highway network that represents a negligible impact and could be easily accommodated on the highway network.

With reference to table 6.3 of the Transport Statement it is clear that the additional HGV traffic flow on the West Hoathly Road is an additional 62 HGV movements. This is additional to the assessed 97 movements previously recorded, which is a +60% increase in HGV movements along the West Hoathly Road. It is not considered that increasing the flow of HGV along this route by over 60% is either negligible or easily accommodated on this section of the highway.

The length of West Hoathly Road between the junctions with St Hill Road and Dunnings Road is very narrow where it is incredibly difficult for one lorry and a car to pass each other. The section of road between the entrance to Standen and the proposed exit point from the Evergreen site is so narrow that there is a section where it is not possible for two cars to pass. The hard outcrops of stone on the sides to the West Hoathly road make any movement off the metalled surface impossible and prevent any widening. The proposed number of lorries travelling along this stretch of road would create blockages which would prevent traffic reaching Standen and also cause long queues using the road as an exit and entry point to East Grinstead.

Overall the proposed increase in and frequency of HGV movements along the West Hoathly Road, passing the Standen entrance every 10 minutes will have a significant and detrimental impact on the physical access and accessibility of visitors to the Standen visitor attraction. This will be both in terms of the actual physical ability to enter and exit this visitor attraction, to safely negotiate an access impeded by regular and frequent HGV movements in a rural setting, and in terms of the experience of and setting of the heritage asset and the approach to and appreciation of the heritage asset and the attractiveness and draw of visitors to it.

The access to Standen for visitors will be affected by the movement of HGV's in terms of blocking of the West Hoathly Road at peak and other times, and potential visibility and turning safety issues entering and exiting Standen in the face of, and anticipation or ignorance of, the movement of HGV's along the West Hoathly Road. Standen received in 2019 on average 184 cars a day with a range of between 84 – 332 a day depending on the time of year (Christmas being a significant peak as well as Bank Holidays). This number is for cars entering so is doubled for total visitor access. There will inevitably be conflict between these visitor access movements and the indicated 6 lorries per hour, with movements delayed, blocked or otherwise interrupted by the lorry movements and knock on effects on other vehicles movements on the West Hoathly Road. There is particular concern regarding the right turn exit from Standen going north on the West Hoathly Road towards East Grinstead where the visibility is not good and lighting and shadowing from tree cover, may cause additional issues with safe turning.

Please note that the National Trust now operates a booking system for visitors to manage Covid regulations and this has the effect of 'evening out' our visitor arrivals. As well as helping to keep all our visitors safe this has the added benefit of managing visitor peaks and flow which alleviates any issues of visitor arriving and queuing at Standen, but also means that visitors are arriving on a more even and distributed basis throughout the day.

The indicated signage may be both a hindrance and a barrier in these terms as it may inform visitors of issues, but may also deter visitor from proceeding to Standen if they are aware of problems. In either case signage alone does not solve any matters relating to the safe entry and egress from the Standen access in the face of significant additional movements of large HGV's in a small rural lane.

In heritage terms the setting of the heritage asset is a material consideration. The application fails to give proper account to and consideration of the setting of the heritage asset, Standen House, and peoples experience of the approach to and appreciation of the access and arrival at the historic house. Standen's 'spirit of place' (see attached) identifies the character of Standen in terms of its remote and tranquil location and the arts and crafts inspiration behind its design and the philosophy behind that movement. The location and access to Standen is part of the setting that expresses and encapsulates that spirit and ideal of the arts and crafts movement.

That experience and arrival at this essential remote and tranquil rural escape from the industrialised contemporary mood was the explicit intention of the architects of Standen, and this will be totally disrupted by arriving to be met by heavy goods vehicles moving across the entrance, changing the atmosphere and character of the location and environment, quite significantly.

Much of the 'draw' to a National Trust visitor attraction is the sense of arriving at a usually rural, peaceful and contemplative locality, and a sense of well being associated with the outdoors, exceptional architecture and historic ambiance and character. Being met by huge, noisy industrialised transport vehicle every ten minutes, and the attendant dust and intrusion into that sense of well being and tranquillity, will have a material and significant impact on the draw to and attractiveness of the site for visitors. In short, the proposed lorry movements are very likely to have a significant impact on the attractiveness of the offer at Standen and impact very negatively on visitor numbers and the commercial operation of the site.

The National Trust is recovering from the Covid lock down constraints and sites like Standen have only just re-opened using a booking system to manage visitor numbers but the site, like all NT attractions, is dependent on visitors for its income, and receive no government funding. Any additional impact on or issues that may or could affect visitor numbers will have a greater and more compound impact on the business and its financial condition than before.

The National Trust therefore identifies the applicant as an 'agent of change' in regard to para 182 of the National Planning policy Framework (NPPF) which states that;

“Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.”

The impact of disruptive development on a heritage visitor attraction has been highlighted in the recent Haughley Park appeal (ref APP/W3520/W/20/3258516) and it is considered that the impact of HGV movements affecting the entrance to Standen will materially impact on the business viability and visitor numbers attracted to Standen and that the application as presented fails to mitigate for or moderate these impacts. Neither the heritage assessment or LVIA submitted address these matters of the impacts on the heritage asset of a major industrial activity, on the very entrance to it, and the application fails in this regard.

The National Trust made some reference to the environmental issues and concerns about the effectiveness and need for the development mainly in terms of the pollution issues. The following are additional responses relating to the pollution matters.

The Planning Statement briefly touches of the matter of control of dust under section 2.34 and it suggests that a management plan will be integrated into a Construction Environmental Management Plan (CEMP), which itself could be required as a pre-commencement condition – this is something that we would support. This would also hopefully provide more clarity of the proposal that suggested 'seasonal and/or limited periods of working along the western boundary to avoid dust and noise impacts'.

The Geotechnical Design Report from EPG touches on post construction maintenance (Section 6) and whilst there is a proposal to undertake 6-monthly inspections of the gas vents and cap, we are surprised that no mention is made with respect to also extending these inspections to include the surface water and leachate management systems to ensure that they continue to work as intended.

The National Trust consider that the environmental case for the proposal is still unclear and subject to technical consideration and comment from the various regulators as to the need for the capping and the management of the site ongoing and any pollution issue outstanding, and would still seek to be convinced of the overall justification of the proposals.

Were the Planning authority minded to approve the application and without prejudice to our concerns above and in our previous objections, the National Trust would welcome dialogue with the developer and the Planning Authority in regard to appropriate conditions and mitigation measures to manage the impacts of the proposal on our property and business as follows.

## Conditions

Restriction of use of Evergreen Farm track to normal agricultural use and for no other purposes, including any traffic generated by or for the proposed development.

Amendment of the application red line to remove land in National Trust ownership no longer associated or needed for the development.

Hours of operation, restriction of hours of operation to exclude Saturday mornings, bank holidays and other times such as school holidays and last 2 weeks in December.

Improvements to and safety measures to ensure adequate highway operation entering and exiting the Standen attraction, including any highway improvements, visibility splays – to be discussed with the transport consultants

## Mitigation

The National Trust would welcome dialogue with the applicant in regard to the proposed signage including wording, location and messaging included (as well as any branding)

Review of the Construction Management Plan (CMP) to include provision for banksmen / traffic management personnel to staff and manage traffic impacts on the Standen entrance

Priority measures in the CMP to give visitors priority over HGV movements entering and exiting Standen (as managed by banksmen, traffic lights etc)

Timing of lorry movements to prioritise operations outside of normal Standen visitor operations, 10am – 4pm

Priority for bus stop operations

Reducing traffic movements on bank holidays, Easter school holidays and last 2 weeks in December

## Summary

For the reasons outlined above, the National Trust objects to the development as proposed, due to the significant impacts on the visitor attraction at Standen. The application fails to provide for conditions and mitigation to manage these impacts and requirements detailed above. Without a satisfactory resolution of these issues and inclusion of relevant conditions and updating of the construction management plan, traffic statement and updating of the heritage assessment to reflect the setting of Standen House, the National Trust consider that the impacts of the development on Standen and its operation as a visitor attraction will be unacceptable, and that the application should be refused under para 182 of the National Planning Policy Framework.

Average numbers of people / cars entering Standen each day (this is only cars entering)

		Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
January	People	72	95	64	58	87	473	617
	Cars	28.8	38	25.6	23.2	34.8	189.2	246.8
February	People	306	305	370	341	430	660	779
	Cars	122.4	122	148	136.4	172	264	311.6
March	People	272	236	213	255	335	483	887
	Cars	108.8	94.4	85.2	102	134	193.2	354.8
April	People	965	625	722	661	803	913	1121
	Cars	386	250	288.8	264.4	321.2	365.2	448.4
May	People	805	406	334	430	346	532	686
	Cars	322	162.4	133.6	172	138.4	212.8	274.4
June	People	305	273	289	333	260	512	688
	Cars	122	109.2	115.6	133.2	104	204.8	275.2
July	People	342	343	352	365	350	464	679
	Cars	136.8	137.2	140.8	146	140	185.6	271.6
August	People	549	546	472	575	470	567	719
	Cars	219.6	218.4	188.8	230	188	226.8	287.6
September	People	549	546	472	575	470	567	719
	Cars	219.6	218.4	188.8	230	188	226.8	287.6
October	People	242	300	310	250	310	477	691
	Cars	96.8	120	124	100	124	190.8	276.4
November	People	176	171	176	167	226	486	694
	Cars	70.4	68.4	70.4	66.8	90.4	194.4	277.6
December	People	402	363	514	438	523	821	1056
	Cars	160.8	145.2	205.6	175.2	209.2	328.4	422.4

## Spirit of Place: Standen House & Garden



### Spirit of Place

Standen sits within the Sussex Weald, fashioned from a carefully-chosen palette of materials taken from the local landscape.

It is the product of a highly successful collaboration between leading Arts and Crafts architect Philip Webb and the Beale family. Informed by Webb's unerring eye for detail and inventive imagination - they created together, a vibrant, hospitable home ideally suited to the Beales' love of the outdoors, gardens, entertaining, beautifully furnished interiors and artistic endeavour.

Just as originally envisaged, Standen today feels harmonious, safe and peaceful and gently refreshes all who visit. A sense of discovery and exploration abounds within the garden and woodlands and in the long views of the Ashdown valley. The house is welcoming and warm; as you step inside the Beales' artistic legacy is revealed and a strong sense of their happy family bond and well-ordered domesticity is tangible.

Standen is a place which engages with your senses, whether through architecture, objects, garden or wider estate – it is alive and relevant and continues to connect and inspire all those who discover it.

'The human quality of.....[Standen] lingers with one like a choice flavour'<sup>1</sup>

<sup>1</sup> Halsey Ricardo, 'The House in the Country' *The Magazine of Art*, January 1900, p.105

The full quote reads: 'The human quality of the building lingers with one like a choice of flavour; like a portrait by a fine painter one wants to know the sitter; so here one gets a kindly impression of all human individualities that have co-operated to bring about a result'.