

# **Consultation Statement**

## **Witley Conservation Area Appraisal (CAA)**

### **Introduction**

Waverley Borough Council prepared a draft Conservation Area Appraisal (CAA) for Witley and carried out an associated consultation. This report outlines how the consultation was undertaken, who was involved and how responses were considered.

### **Consultation Process**

The consultation started on Friday 12 December 2014 for six weeks, ending on Friday 23 January 2015.

The following methods to inform the public of the consultation included:

- Letter to all residents and businesses in the CA and in the proposed extension areas (Appendix A)
- Letter for key stakeholders including:
  - Parish Council
  - Surrey County Council Highways, Landscape and Archaeology
  - Key consultees (English Heritage, Natural England and Environment Agency)
  - Relevant internal Waverley officers
  - Local Councillors

A hard copy of the draft Witley CAA document was made available at Planning Reception, Council Offices, Godalming (Monday to Thursday 9am – 5pm and Friday 9am – 4pm) and a copy could be viewed online at [www.waverley.gov.uk/witleycaa](http://www.waverley.gov.uk/witleycaa).

Whilst the consultation was focussed, it did not preclude other interested parties from responding. In addition to the webpage on the Council website, a press release (Appendix B) was issued to inform the public of the consultation.

A full summary of the consultation responses is set out below. The main issues have been identified as a result of this process and where practicable and appropriate, amendments made to the CAA.

A walkabout was conducted with Local and Parish Councillors and environmental enhancement projects for the management plan were highlighted. This gave participants the opportunity to raise questions, but also to gain feedback on the content.

Respondents were able to comment on the draft Witley CAA in a variety of ways:

- Via the online Innovem (consultation) database accessed via the website (with no need to register)
- By email to the conservation inbox ([conservation@waverley.gov.uk](mailto:conservation@waverley.gov.uk))
- By letter

A number of key questions were asked:

- Do you have any comments on the draft Witley Conservation Area Appraisal, and should it cover any other issues?
- Do you have any comments on the draft Management Plan, and should it cover any other issues?
- Do you agree with the proposed Conservation Area extension at Enton Mill? (see plan attached). Do you have any comments?
- Do you agree with the proposed Conservation Area extension at Witley Lodge? (see plan attached). Do you have any comments?
- Do you agree with the removal of George Eliot Close from the Conservation Area? (see plan attached). Do you have any comments?
- Do you agree with the removal of the tree nursery from the Conservation Area? (see plan attached). Do you have any comments?
- Do you agree with the removal of the parcel of land off Church Lane from the Conservation Area? (see plan attached). Do you have any comments?
- Are there any other areas that should be included or excluded? If so, please identify where the boundary should be extended or reduced, what it should include or exclude, and why?

### Consultation Responses

69 responses were received to the draft document, of which 28 were a copy of a proforma circulated within the village. 4 additional copies of the proforma were received with no contact details. A petition was received with 156 signatures. The responses fell into one of five categories:

- 1) Key consultees
- 2) General comments on the CAA and Management Plan
- 3) Comments on the proposed extensions
- 4) Comments on the proposed removals
- 5) Suggestions for other boundary amendments

The comments are summarised below:

#### 1) Key consultees

Consultee	Comment
English Heritage	<p>Considers the appraisal a very thorough assessment of the conservation area covering most of the key topic areas set out in English Heritage guidance. Authority might wish to consider including in the management plan section ways in which the LPA would wish to see such change accommodated to ensure that the conservation area retains the qualities which led to its designation. The appraisal could also consider if there is likely to be pressure for certain types of small scale change and provide guidance in relation to this.</p> <p>“We are supportive of the suggested boundary changes which follow the guidance in our documents mentioned above.”</p>

Witley Parish Council	Resident's concerns were noted but the Committee understood that these did not constitute grounds for rejecting the draft document which followed guidelines from English Heritage.
SCC Archaeology (specifically relating to the tree nursery)	<p>There are no County Historic Environment Records (HER) of any period located within the 'tree nursery' site. Historic maps show the boundaries of the field may have shifted in the recent past, but there is no indication that the area was ever anything other than open space. A LiDAR survey does not suggest relict earthworks on the site indicative of previous occupation or construction. It does depict a former field boundary and pathway so has not 'failed' to record evidence from the site.</p> <p>SCC Archaeologist does not object to the removal of the tree nursery from the CA after assessment of its contribution to the historical significance of the area.</p>
Natural England	Does not wish to comment on the details of this consultation
SCC Highways and Landscape	No comments were received.

## 2) General comments on the CAA and Management Plan

### Procedural comments:

Comment	Response
What is the CAA and why has it been produced now?	<p>The CAA aims to identify the special interest of the CA and produce a management plan which highlights areas for improvement to enhance the character of the CA.</p> <p>Legislation and local planning policy states that it is the duty of the Council to produce a CAA for each CA. A timetable for the commencement of CAA's in Waverley was agreed at Executive in 2011.</p>
Comments were received regarding the consultation procedure	<p>Although the Council are not required to undertake a public consultation, it is considered best practise. Following the SPD consultation procedure ensures the document is robust and will stand up at appeal. The boundary of the CA was deemed the most appropriate extent for direct notification by letter and has been successful in other CAA consultations.</p>

### CAA comments:

A number of comments were received which gave additional local knowledge and information. The document has been updated accordingly.

<b>Comment</b>	<b>Response</b>
The CAA should include the vistas: <ul style="list-style-type: none"><li>- South from the footpath to the Church and the tree nursery.</li><li>- Witley Recreation Ground</li></ul>	The vista from the footpath across the tree nursery to the churchyard is interrupted physically by a line of trees on the boundary of the churchyard. Even in winter the view is limited at best. There are many views from the boundary looking out to surrounding countryside. For this reason, the report does not identify all key vistas within the setting of the CA.
Suggested inclusion of a plan showing the settlement boundary and CA boundary	It is not deemed necessary to include the settlement boundary within the CAA. The CAA document, if adopted, will be a material consideration for all planning applications proposed within, and adjacent to, the CA.
Village should not be split into Conservation Area and non-Conservation Area which reflects the housing market.	The CAA assesses the historic and architectural interest and character of the CA and is not influenced by the housing market.
No 26 George Eliot Close should be part of Architectural Zone 2 as built in 1890	Although 26 George Eliot Close is a late 19 <sup>th</sup> century building, it is removed from and does not contribute to the overall character of Architectural Character Zone 2.
Is there justification for keeping Miltons Yard in the CA and not the undeveloped tree nursery?	Miltons Yard in its own right is of no special or architectural interest, however it is clearly part of the built fabric of the CA; its relationship to the CA is important. Removing Miltons Yard from the CA would create an island effect in the middle of the boundary which is not considered good practise.

### Management Plan comments:

<b>Comment</b>	<b>Response</b>
Bollards should not be removed between Northfields and George Eliot Close; If George Eliot Close is removed from CA then questions requirement of this.	The Management Plan does not propose removal of the bollards or to make a through road between George Eliot Close and Northfields.  The transition between the two roads is a focal point from the junction of Northfields and Petworth Road.

<b>Comment</b>	<b>Response</b>
<p>Traffic calming measures on Petworth Road a great idea.</p> <p>Objection to urbanisation of Church Lane and use of speed bumps/ yellow and white lines/ additional road signs.</p>	<p>Traffic management is captured within the CAA Management Plan to acknowledge this as a potential issue in Witley. As Petworth Road is an A road, any projects would have to be led and implemented by SCC Highways.</p>
<p>Space for school parking should be considered to stop parents parking at George Eliot Close.</p>	<p>Parking has been recognised as an issue and the Management Plan amended accordingly. Any changes in yellow lines or parking would have to be taken up with SCC Highways.</p>
<p>The bus shelter and bench should not be moved as will be out of sight from the road and therefore the bus may not stop.</p>	<p>If the project is to be implemented, the design would need careful consideration to ensure that it is appropriate and functional.</p>
<p>Highway related suggestions:</p> <ul style="list-style-type: none"> <li>- Reinstate the 'slow'/ 30mph sign outside Bank Cottage as an area prone to accidents.</li> <li>- Pedestrian crossing on A283 (Petworth Road)</li> <li>- Place a bus stop on the south side of Petworth Road</li> </ul>	<p>These are matters for SCC Highways.</p>
<p>Management Plan is too general – a detailed traffic / noise study should be conducted and compared to other areas of the borough. Petworth Road is no busier than other roads in the borough and should be treated the same.</p>	<p>It is not the purpose of the Management Plan to address these issues in such detail. Such studies, if required, would be instigated by SCC Highways or the Parish Council.</p>
<p>Improve pedestrian barriers at entrance to footpath off George Eliot Close towards All Saints Church.</p>	<p>The entrance to the footpath is not within the CA and therefore it is not the responsibility of the CAA management plan to identify this issue.</p>

### 3) Comments on the proposed extensions

#### General comments:

<b>Comment</b>	<b>Response</b>
<p>The extensions proposed are to allow for the removal of other areas of the CA for development.</p>	<p>The amendments to the CA boundary have been assessed on the architectural and historic interest of each individual site, following English Heritage guidance. Future development is not a criteria which can be considered when assessing the CA boundary.</p>
<p>Purpose of extensions are unclear</p>	<p>Please see Section 3.9 of the Witley Conservation Area Appraisal.</p>

a. Enton Mill extension

19 respondents support the extension; 4 object against the extension

The majority of respondents supported the extension, commenting that the area adds significantly to the CA in terms of natural landscape, heritage and architecture.

Those who objected to the extension objected to all changes to the CA boundary.

Comment	Response
Enton Mill ponds should form its own CA	Enton Mill has clear historic links with Witley CA. The ponds contribute significantly to the character of Enton Mill hamlet, and are fed by Witley Ponds within Witley CA. A new CA would not be created based for the ponds as English Heritage guidance is clear that CA designation is not appropriate for areas of natural landscape. The Enton Mill area has a clear connection both architecturally and in its character to the main area of the CA.

b. Witley Lodge extension

17 respondents support the extension; 5 object against the extension.

The majority of respondents support the extension, commenting that it is sensible and logical to include the entire plot of Witley Lodge.

Those who objected to the extension predominantly objected to all changes to the CA boundary.

**4) Comments on the proposed removals**

General comments:

Comment	Response
No areas should be removed; boundaries should remain in the same place to protect for future generations; we should protect more not less.	Many CAs have changed significantly since designation and opportunities to assess the boundary are limited. The CAA process is a timely opportunity to remove land or development which de-values the CA and does not meet the criteria for CA designation as set out by English Heritage. Conversely, this provides an opportunity to extend the boundary where appropriate.
House prices will drop; what would be the compensation for lower house prices as a result of removal from the CA (EH guidance).	There are no mechanisms or provision for compensation as a result of being removed from a CA.
No solid grounds for the removals; the reasoning is unclear	Please see Section 3.9 of the Witley Conservation Area Appraisal.

a. George Eliot Close (in part)

12 respondents support the removal; 19 object against the removal

The respondents who support the removal of George Eliot Close stated the amendment to the boundary was sensible in principle, and since it has been developed from its original use as market gardens, there is nothing of merit remaining on the site.

Comment	Response
<p>Responses regarding future development and associated impacts as a result of removal of the site from the CA:</p> <ul style="list-style-type: none"> <li>- Destroy village life</li> <li>- Over-development of the close</li> <li>- Junction with Petworth Road is already dangerous.</li> <li>- Increased crime</li> <li>- Not enough services/infrastructure to cope with development</li> </ul>	<p>Future development is not a criteria which can be considered when assessing the CA boundary.</p>
<p>No. 26 George Eliot Close should remain within CA.</p>	<p>No. 26 is not proposed to be removed from the CA.</p>
<p>Why was this not considered at time of planning consent?</p>	<p>It is not the role of a planning application to amend the boundary of a CA; it is the purpose of the CAA process.</p>
<p>George Eliot Close is not inward looking and is tidier than Northfields and has better road conditions.</p>	<p>George Eliot Close has insufficient special interest or connection to the CA to justify inclusion. The properties currently within the CA better relate to the wider estate (outside the CA) and are therefore recommended for removal.</p>
<p>Less control over changes to properties and gardens which will be detrimental to the Close.</p>	<p>Permitted Development Rights will increase to be in line with the rest of George Eliot Close.</p>
<p>Number 30 and 32 George Eliot Close have not been proposed for removal. This is contradictory to the reason for removing the rest of the Close. The current proposed boundary cuts through ownership of No. 32.</p>	<p>Whilst 30 and 32 have links to the remainder of George Eliot Close, their location is such that they are well related to the properties on the southern side of Northfields. Whilst in themselves they have no historic or architectural interest which contributes to the CA, their setting between Northcote and Northfields is significant and it is sensible for the boundary to follow the pavement and include rather than exclude these two properties from the CA.</p>

b. Tree Nursery

3 respondents support the removal; 62 object to the removal, of which 28 have been submitted on a proforma circulated around the village (an additional 4 proformas without contact details were also received).

A petition was received with 156 signatures, however some who have signed the petition additionally sent in a response directly to the Council or submitted a proforma.

Comment	Response
<p>A significant number of responses regarding on future development and associated impacts as a result of removal of the site from the CA:</p> <ul style="list-style-type: none"> <li>- Destroy the character of village</li> <li>- Development will intrude on openness and green growth surrounding the church</li> <li>- Intrusion on the graveyard</li> <li>- Potential future use as churchyard</li> <li>- Impacts on wildlife</li> <li>- Insufficient room in schools/surgery</li> <li>- Infrastructure (transport and utilities) cannot support more houses</li> <li>- Parking pressures</li> <li>- No room for an access road</li> <li>- Neighbouring Article 4 direction</li> <li>- Ruin the natural landscape</li> </ul> <ul style="list-style-type: none"> <li>• Conservation Area status is the best way to protect from development</li> <li>• If it is not proposed for development, then there is no reason to change the boundary</li> <li>• Submission of an appeal letter in 1974 which dismisses the appeal for houses on the site due to the impact on the Conservation Area.</li> <li>• Other more suitable brownfield sites</li> </ul>	<p>Status as a CA does not protect the site from future development. Future development is not a criteria which can be considered when assessing the CA boundary.</p> <p>The site has been assessed on its architectural and historic interest, in accordance with English Heritage Guidance 2012. It is deemed not to have sufficient special interest in these regards to remain within the CA.</p> <p>The guidance states that CA designation is not an appropriate means of protecting the wider landscape and other more suitable designation tools exist for such matters.</p> <p>The site is within the Green Belt and the Wealden Heaths Special Protection Area I and II. These constraints are more appropriate planning tools for landscape and wildlife protection and have greater weight in this regard than CA designation.</p> <p>Please refer to Section 3.9 of the Witley CAA document for the reasons for removal.</p>
<p>Consideration should be taken regarding the importance of the footpath to the rear of George Eliot Close.</p>	<p>The footpath is not proposed for removal from the CA.</p>
<p>Potential area of archaeological and geological interest – some belief that the original Witley Manor/ Royal Court was located or partially located on this site; a ridge of Bargate Stone under the site</p>	<p>The SCC Archaeologist was consulted and the evidence provided sent for consideration. It was concluded no evidence supports Witley Manor was located on the tree nursery site.</p>
<p>The tree nursery is identified within the document as a notable area of open space in the CA</p>	<p>The tree nursery was a notable area of greenspace but following English Heritage guidelines, it does not meet the criteria to be within the CA. This comment has been removed from the document as a result of the proposed boundary change.</p>
<p>Witley Manor’s land is to be retained so these should be too</p>	<p>There are clear historic links between the grounds and ponds of Witley Manor and the wider CA.</p>



c. South-west corner of CA on Church Lane

6 respondents support the removal; 44 object against the removal of which 28 have been submitted on a proforma circulated around the village (an additional 4 proformas without contact details were also received).

Comments received in support of the removal of the parcel of land off Church Lane identified that the land was not visible from the CA and that the reasoning was understandable.

Comment	Response
Impacts of development on the site and wider village	Future development is not a criteria which can be considered when assessing the CA boundary.

**5) Suggestions for other boundary amendments**

Comment	Response
Reconsideration of including 6 acre field to the west and south west of Enton Mill, and footpath which leads to Lashams. Field and footpath a historic link between Enton Mill, the mill owners house (Lashams) and Witley.	English Heritage guidance states that CA designation is not an appropriate means of protecting the wider landscape and therefore it is not considered appropriate to include these areas within the CA.  Roke Farm (assumed to mean the area surrounding Lower Roke) is disconnected from the CA by open fields and is protected in its own right by Building of Local Merit designation. Therefore it is not supported for inclusion.
Land to the west of Witley Lodge	
Inclusion of SHLAA site 366 (Land west of George Eliot Close, Witley) and Chandlers School Playing Field	
Roke Farm	
Witley Recreation Ground and SHLAA site 618 (Land west of Petworth Road, Witley).	

**Next Steps**

The consultation has informed the necessary amendments to the document before being submitted through the committee process (Executive and Full Council) for adoption as a material consideration in planning applications and to inform future environmental enhancement works.

If agreed a public notice will be displayed in the local newspaper and London Gazette in accordance with the Planning (Listed Building and Conservation Areas) Act 1990 (Section 70). The Secretary of State will also be given notice of the designation.

## Appendix A – Consultees

- Surrey County Council
  - Highways & Parking
  - Landscape.
- Waverley Borough Council
  - Local Ward Councillors
  - Officers from Planning, Environmental Services, Community Services
- All commercial businesses in CA and proposed extensions
- English Heritage
- Natural England
- Environment Agency
- Southern Water
- SCC Archaeology
- Witley Parish Council
- The Owner/ Occupiers in:
  - Petworth Road
  - Church Lane
  - Churchfields
  - Northfields
  - George Eliot Close (Part)
  - Mill Lane (part)
  - Culmer Lane (part)
  - Miltons Yard

# News Release

Issued by Waverley Borough Council

Date: 11 December 2014

## **Witley Conservation Area Consultation**

Witley residents are being called on to have their say on Waverley Borough Council's draft Conservation Area Assessment which assesses the character and condition of the Conservation Area and contains a Management Plan identifying potential enhancement schemes.

Witley is one of 43 Conservation Areas in the borough, and Waverley is keen to ensure these areas are preserved, and where possible, enhanced, for future generations. To do this the Council is seeking the views and opinions of the local community.

Councillor Brian Adams, Executive member for Planning, said:

“Witley was designated as a Conservation Area in 1980 and the aim of the appraisal is to ensure that the architectural, landscape and historic character of the village continues to be preserved”.

The Conservation Area Assessment proposes amendments to the current boundary of Witley Conservation Area. The Enton Mill area and the garden at Witley Lodge would be included. George Eliot Close, the tree nursery to the rear of Churchfields, and a small parcel of land on Church Lane. Waverley would be excluded.

The document also identifies some potential improvements:

- Improved footpath signs and footpath maintenance
- Improvements to road surfaces at Northfields and Churchfields
- Re-landscape land near bus shelter on Petworth Road and consider re-location of bus shelter

Councillor, Adam Taylor-Smith, Ward Member for Witley and Hambledon, is very keen that Witley residents have their say.

“Local residents know and love their area and so I hope the Conservation Area Assessment will attract a lot of interest and a strong response, particularly about the changes proposed for the boundary and the improvements detailed in the Management Plan”.

The draft Witley Conservation Area Assessment is open for comment until 23 January 2015.

It can be viewed online and comments can be submitted at

[www.waverley.gov.uk/witleycaa](http://www.waverley.gov.uk/witleycaa).

A printed version of the document is available at the planning reception of Waverley Borough Council, The Burys Godalming, GU7 1HR, and responses can be sent by email to [conservation@waverley.gov.uk](mailto:conservation@waverley.gov.uk) or by post for the attention of Jennifer Samuelson.