

From: Emily Wade <Emily.Wade@midsussex.gov.uk>
Sent: 28 August 2026 14:19:22 UTC+01:00
To: "Steven King" <Steven.King@midsussex.gov.uk>
Subject: DM/26/0131 Imberhorne

Hi Steve

Please find below comments on the above RM application. This follows on from the granting of a hybrid planning permission relating to this site and adjacent land in December 2023. The current proposal relates to land to the west of Imberhorne Lane, which is currently a series of fields. As set out in my comments on the hybrid application DM/23/2699 the proposal to construct 550 new houses on this site affects the settings and special interests of number of heritage assets. My previous comments are attached below, and give a detailed assessment of the affected assets, the nature of their special interests, and the contribution made by setting, including the application site, to these interests.

Based on the information submitted with the hybrid application a level of less than substantial harm, through impact on setting, to the special interests of all of these assets was identified as arising from the proposal. Again, this is set out in detail in my previous comments.

The application now before us is a Reserved Matters application relating to the residential aspect of the development. Based on the most recently submitted site Masterplan and other supporting documents, it would appear that the site layout has been amended since outline stage including in terms of the disposition of built form and open space along its southern side, adjacent to the PROW which runs between Imberhorne Farm and Gullege, which is the part of the scheme closest to the heritage assets and most prominent within their settings. These changes include introduction of 'amenity spaces' as part of the landscaped strip to the north of the PROW, to the northeast of Gullege and the northwest of Imberhorne Farm, as well as further housing between the primary school site and the PROW to the northeast of Imberhorne Farm. These changes are likely to result in a slight increase in the levels of harm previously identified to the heritage assets at Gullege and Imberhorne.

In their comments on the current application, Historic England point out that in their response to the hybrid application they had suggested mitigatory measures to include a substantial landscaped strip along the northern side of the PROW. As now proposed, they note the strip is relatively wide to either end, but narrows along the mid part of the length of the bridleway, and suggest that this should be amended to show a wide strip along the full length of the PROW with dense planting of appropriate native species. These comments were received on 19th June; however the latest package of revised drawings received from the applicant in July show no amendments made in response to this advice.

In respect of the approved hybrid application, the following levels of harm were identified by the Council:

- Gullege- mid-high level of less than substantial harm
- Imberhorne Farm - mid-high level of less than substantial harm
- 1-3 Imberhorne Farm Cottages- low-mid level of less than substantial harm
- Imberhorne Farm Courtyard- mid-high level of less than substantial harm

As noted above, the changes made to the masterplan will in my opinion result in some increase in the levels of harm arising to each of these assets. In the context of the new NPPF, these levels would translate as follows, based on a level of harm sitting within the range which does not equate to substantial harm or total loss of significance:

- Gullege- an upper mid-high level of harm
- Imberhorne Farm – an upper mid-high level of harm
- 1-3 Imberhorne Farm Cottages- a mid-level of harm
- Imberhorne Farm Courtyard – an upper mid-high level of harm

These harms would under paragraph HE6.4 stand to be weighed against the public benefits of the proposal.

In carrying out this balancing exercise, the Council must also be mindful of the substantial weight that should be given to an asset's conservation (HE6.1) (bearing in mind the II* listing of Gullege and of Imberhorne Farm Cottages), and that any harm to a designated asset shall be of considerable importance and weight (HE6.3).

The NPPF also requires at HE4.1 that development proposals should avoid or minimise harm to the significance of heritage assets, and instead conserve this significance. HE4.2 requires that any harm to, or loss of significance of a heritage asset should have a clear and convincing justification. In my opinion, the adverse revisions to the Masterplan following on from the approved outline scheme, and the failure to address the suggestions made by Historic England in respect of mitigatory measures, demonstrate that the proposal has failed to minimise the harm arising to heritage assets, and therefore does not meet the requirements of HE4.1 or HE4.2.

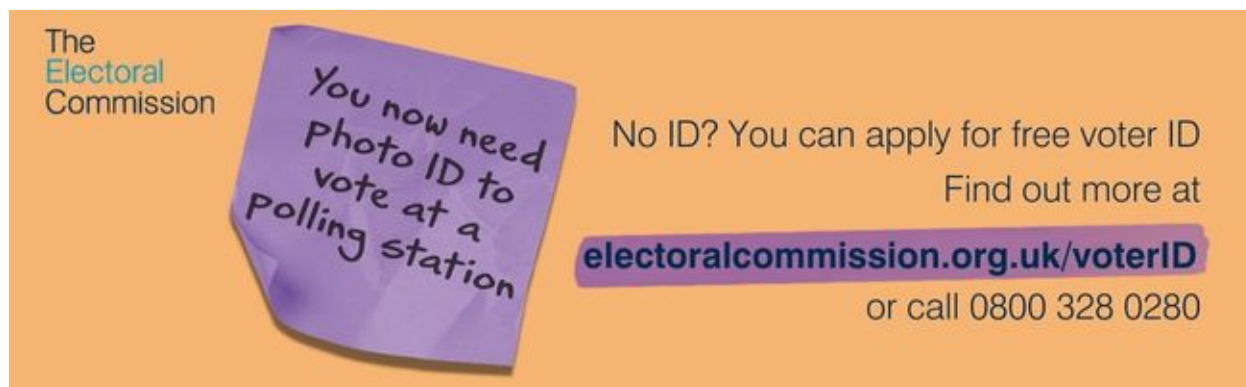
Thanks,

Emily

Please note that this advice is given at Officer level only and is without prejudice to the formal decision of the District Council.

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From: Emily Wade <Emily.Wade@midsussex.gov.uk>
Sent: 19 January 2024 15:30
To: Steve Ashdown <Steve.Ashdown@midsussex.gov.uk>
Subject: DM/23/2699 Imberhorne

Hi Steve

Please find below comments on the above application. My apologies for the delay in getting these to you which has been caused by an issue with Enterprise, which is now resolved.

The application site is an extensive area of agricultural land located to the west of Imberhorne Lane on the western edge of East Grinstead. There are a number of heritage assets immediately adjacent to the site boundary, which are:

- Gullege, a Grade II* listed early 17th century manor house, located to the south west of the development site, between the proposed residential development and SANG area. There are former farm buildings including a barn to the west of the house which would be regarded as curtilage listed.
- Imberhorne Farm, a Grade II listed former farmhouse dating from 1820, located towards the south east of the site between the proposed residential development and care community.
- 1-3 Imberhorne Farm Cottages, a II* listed early 15th century hall house, now altered and extended to form a group of cottages.
- Imberhorne Farm courtyard, a group of former farm buildings located to the north of the Farm Cottages and the west of the former farmhouse. These buildings date from the 19th century and would be regarded as curtilage listed.

A public right of way runs east-west through the site linking Imberhorne Farm and Gullege with each other and with Imberhorne Lane. A second PROW crosses this north-south between the proposed residential development and SANG, passing Gullege. The Worth Way links to this second PROW south of Gullege, and runs east-west along the line of the former railway track to Imberhorne Lane. It runs along the southern boundary of the part of the site indicated as the proposed care community, and there are views from several points along it looking north towards or across the site. There are also views over the eastern part of the site looking west from Imberhorne Lane.

To consider the affected heritage assets in turn:

Gullege possesses architectural interest based on its construction and craftsmanship, as well as historical illustrative value as a very good example of a small rural Sussex manor or farmhouse of its period. It also possesses aesthetic value based in part on the use of vernacular materials viewed within the landscape from which they were drawn.

To the west of the house is a former barn building with other attached buildings which, from historic map regression, were previously part of a farm courtyard in this location, associated with the Gullege farmstead. The surviving buildings would be regarded as curtilage listed, and have group value with the house.

As with Imberhorne Farm, it is likely that Gullege had a historical relationship of ownership and function with parts of the surrounding farmland, which again enhances the contribution of the surviving rural character of that land to the significance of the asset.

As such, the surviving rural setting which surrounds the house will be considered to make a strong positive contribution to its special interest and the manner in which this is appreciated, in particular those parts of that value which are drawn from its historical illustrative and aesthetic values. The surrounding agricultural land will affect the character not only of views from and towards the listed building, including views from south from but also of the approaches to it along the adjacent PROWs. The site comprises a significant part of that land, including that to the west, north and north east of the house. There are particularly attractive views looking north from the Worth Way towards the principle south facing façade of the house, in which part of the site forms the backdrop and context to the listed building.

The presence of screening by trees and planting around some parts of the house and its immediate garden setting is noted, but given the potentially ephemeral nature of this screening only limited weight can be attached to it in terms of assessing the contribution of the wider rural setting to the significance of the asset, and in considering the impact of the proposed development on this contribution.

Imberhorne Farm would be considered to possess architectural interest based on its design, construction and craftsmanship, as well as historical illustrative value as a good example of a relatively high status Sussex farmhouse of its period. It also possesses aesthetic value, and group value with the former farm buildings considered below. The Imberhorne farmstead is recorded in the West Sussex Historic Farmstead and Landscape Character assessment as a historic farmstead of the post medieval period.

As such, the surviving rural setting around the house will be considered to make a strong positive contribution to its special interest, in particular those parts of that interest drawn from historical illustrative and aesthetic values. As with Gullege, the agricultural land around the house affects not only the character of views from and to the listed building, but also of the approaches to it along the adjacent entrance track/PROW, including views towards the farm complex from the Worth Way, and from Imberhorne Lane.

The application site includes the fields to the east and north of the farmstead, and as such constitutes a significant part of that setting. Again as with Gullege there is a degree of screening by planting around the house and its gardens; however given its potentially ephemeral nature this can be given only limited weight in assessing the impact of the wider setting on its significance or of the proposed development on that significance.

The importance of the agricultural setting to the special interest of the building and the manner in which this is appreciated is enhanced by the likely historical relationship of ownership and function between the farmland and the farmhouse and farmstead to which it was most probably formerly attached.

1-3 Imberhorne Farm Cottages will possess architectural interest based on its construction and craftsmanship, particularly in relation to the surviving structure of the early 15th century hall house which is now enclosed within the much more recent Victorian farm cottage row which provide the external appearance of the building. This is the most significant aspect of the building, and explains the grade of its listing, however it does also possess historical illustrative value which will include its narrative as an early building which has survived over many centuries and been altered and adapted to suit the evolving needs of the farmstead, and some aesthetic value. In addition, the building has group value with the farmhouse, as the farm cottages were part of the functional whole of the 19th century farmstead.

As such, as for the farmhouse, the surviving wider rural setting of the building will make a positive contribution to its special interest and the manner in which this is appreciated, in particular the character of the approach to the building as part of the Imberhorne farmstead along the entrance track/PROW to the north, and of the landscape within which the building as part of the farmstead is seen in views from Imberhorne Lane and Worth Way.

Imberhorne Farm Courtyard, as above, consists of an arrangement of 19th century former farm buildings around a yard to the west of the farmhouse. They would be regarded as curtilage listed, and would be considered to possess architectural interest based on their design (which would be related to their original purpose), construction and craftsmanship, as well as historical illustrative value as a good example of a farm courtyard of the period, aesthetic value, and group value with the farmhouse and other buildings within the former farmstead.

As such the surviving rural setting would be considered to make a strong positive contribution to the special interest of the curtilage listed buildings and the manner in which this is appreciated, including in particular those parts of that interest which are drawn from historical illustrative and aesthetic values.

The application site, as for the other buildings in the farmstead, constitutes the setting to the north and east of the courtyard, and affects not only views to and from the buildings (in particular views looking to the north, towards the courtyard from the adjacent PROW, and of the wider farmstead from Worth Way and Imberhorne Lane), but also the character of the approach to them along the adjacent entrance track/PROW.

The current application, which follows on from pre-application advice, is a hybrid planning application seeking 1) outline planning permission for a mixed use development comprising up to 550 dwellings (Use Class C3), a care village of up to 150 dwellings (Use Class 2), land for a 2 form entry primary school (including early years provision and special needs education provision), mixed use neighbourhood centre, allotments, landscaping and sustainable urban drainage; and 2) full planning permission for playing fields, new sports pavilion, and running track associated with Imberhorne Secondary School, a Suitable Alternative Natural Greenspace (SANG) with associated car park, access from Imberhorne Lane, internal road to the SANG and associated landscaping and infrastructure.

Some amendments have been made to the form and layout of the development, and associated landscaping (including screening by planting) based on pre-application discussions, however the proposal will nonetheless have a fundamental impact on the character of significant parts of the settings of the above mentioned heritage assets, which will adversely affect the positive contribution currently made by setting to the special interests of these buildings:

Gullege. The proposal is for extensive residential development including a new primary school site across the currently open rural land to the north east of the house. It is noted that a buffer has been retained between the PROW/entrance track running east-west to Gullege from Imberhorne Lane, and also that the area immediately to the north east of the house is shown as an orchard, measures which will have some mitigatory effect on the impact on the rural character of the setting of the listed building, including the approach to it from the east.

However, the scale and nature of the development is such that it will inevitably have a fundamental impact on the character of this part of the setting of Gullege, which will remove and reverse the currently positive contribution which the site makes, through setting, to the special interest of the listed building and how this is appreciated. There is likely to be a marked impact not only on views from the building and its immediate setting, but also on views and vistas towards Gullege from the surroundings including the adjacent PROWs. The attractive views towards the principle frontage of the house from Worth Way, for example, will be adversely impacted by the intrusion of the development into the context to the north and north east within which the building is appreciated. The currently rural character of the approach to Gullege along the entrance track from Imberhorne Lane will also be fundamentally impacted, notwithstanding the proposed screening and the retention of the open land to the south of the track.

The impact will not be limited to visual effects, as the proposed development will also result in a very significant increase in noise and activity in proximity to Gullege, which currently sits in a position of tranquil rural isolation. This will also have a significant adverse effect on the positive contribution which setting currently makes to the special interest of the listed building and the manner in which this is appreciated.

The proposal also includes a substantial area set aside as a SANG, which will occupy the fields to the west of the house, save one area immediately adjacent to the listed building which is outside the application site. Although this will be a less impactful use than the residential development to the north east, the proposed landscape masterplan suggests a degree of formalisation of the space, including the creation of a network of paths. The change in the visual character and intensity of use of this currently agricultural land will also have some adverse impact on its current positive contribution to the setting and special interest of Gullege, including views from and to it, and the approaches to it along affected PROWs, in that it will no longer retain its historical agricultural character, but will appear more as a country park.

Overall, I would consider that the proposal will, despite the noted mitigatory measures, result in a mid-high level of less than substantial harm to the special interest of Gullege, and the manner in which this is appreciated. Paragraph 208 of the NPPF and the balancing exercise set out within it will therefore apply.

Imberhorne Farm The proposed development abuts the Imberhorne Farm farmstead to the north and east. To the north, contrary to other rather more sympathetic plans seen in previous iterations of the

scheme, residential development is shown in close proximity to the farmstead, although as with Gullege it is noted that a planted buffer is shown between the two, including what appears to be new hedge or tree planting. To the east, the proposal shows a care community, with the new access to the site running from Imberhorne Lane along the northern side of this, before passing near to the north east corner of the farmstead into the main part of the site.

The cumulative affect of this development, which will fundamentally alter the currently open and rural character of the land involved, will be to remove and reverse the positive contribution which this part of the site currently makes through setting to the special interest of Imberhorne Farmhouse. This impact will be not only on views from and towards the farmstead, including views from adjacent PROWs and the entrance track to the farm, and views towards the farmstead from Imberhorne Lane which will be obstructed or severely intruded upon by the proposed care community, but also on the character of the various approaches towards it. As with Gullege, there will also be a very significant impact on the currently relatively tranquil rurality of the setting of the farmstead, with a marked increase in noise and busyness. In this instance the increase in vehicle movements is likely to be particularly notable, given the proximity of the main access into the residential development to the north.

I would consider this to result in a mid-high level of less than substantial harm, through impact on setting, to the special interest of the listed building. Paragraph 208 of the NPPF will again apply.

1-3 Imberhorne Farm Cottages As noted above, the significance of this asset and the contribution of setting towards this does vary somewhat from the other affected listed buildings, given the relative importance of the internal fabric of the original hall house. However, as also noted, the rural setting does make a positive contribution to some aspects of the significance of the building, in particular those parts of its special interest which arise from its historical illustrative value as a building which has developed over time as part of a historic farmstead, and its aesthetic value.

The proposal will have a marked impact on the wider rural setting to the north and east of the Cottages, for the reasons described above in relation to the farmhouse.

However, given the differing nature of the special interest of this listed building, and its position within the farmstead, which means that existing buildings outside the site provide some screening in views from/to the north, I would place the degree of harm caused by the proposal through impact on setting at around the low-mid point of the less than substantial scale.

Imberhorne Farm Courtyard. These buildings, as with Imberhorne Farmhouse, are in close proximity to the residential development to the northern part of the site. The Farmhouse will provide a degree of screening between the courtyard and the proposed care community to the east, however this land is a significant part of the wider rural setting of the farmstead and in particular affects the character of the approach to it from Imberhorne Lane, and of views of it from the same direction, which as above would be blocked or severely encroached upon by the proposed development.

The impacts of the proposed development on the setting of the farm courtyard are therefore similar to those on Imberhorne Farmhouse. I would therefore place the harm on its special interest, through impact on setting, at the mid-high level of the less than substantial scale.

Thanks,

Emily

Consultation with MSDC Conservation Officer and Historic England during the early iterations of the Development's layout design. The consultation took the form of a meeting with MSDC on 13th February 2020 and a virtual meeting with Historic England on 6th May 2020. These consultations lead to the removal of a block of housing that had been proposed to be to the west of Imberhorne Farm and Cottages, the removal the field to the west of Imberhorne Farm from the red line area and the stepping back of the southern edge of the housing to the north and north west of Imberhorne Farm.

Please note that this advice is given at Officer level only and is without prejudice to the formal decision of the District Council.

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