

From: Emily Wade <Emily.Wade@midsussex.gov.uk>
Sent: 27 January 2026 11:38:13 UTC+00:00
To: "Joseph Swift" <Joseph.Swift@midsussex.gov.uk>
Subject: DM/25/1986 Northern Arc

Hi Joe

Thank you for your email with respect to the above application.

The reserved matters application relates to the southeastern portion of the Northern Arc development. This part of the wider site is directly to the east of the Grade II listed building at Firlands, on the opposite side of Isaacs Lane. Having reviewed the submitted Heritage Statement, I note that it concludes that there will be no harm caused through impact on setting to this heritage asset (p. 6). This is contrary to the Council's opinion as expressed in my previous comments dating from March 2019 (repeated below) in relation to the outline application, when it was noted that the applicant's heritage advice significantly understated the impact of the development on several heritage assets, including Firlands. It is disappointing that this opinion has not been taken on board when the heritage advice was updated, and that consequently (one would assume) little or no consideration will have been given to mitigating the impact on the listed building as part of the current application. The submitted site and landscaping plans certainly give no indication that this has been the case.

The proposal will result in less than substantial harm, through impact on setting, to the special interest of Firlands. I would place this harm at around the mid level of that spectrum. The balancing exercise set out in paragraph 215 of the NPPF will therefore apply.

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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<http://www.planningportal.gov.uk>

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From: Emily Wade <Emily.Wade@midsussex.gov.uk>

Sent: 01 March 2019 12:08

To: Louise Yandell <Louise.Yandell@midsussex.gov.uk>

Subject: DM/18/5114 Northen Arc- Built heritage comments.

Hi Louise

Please find below comments on the outline application for the Northern Arc in relation to the impact on built heritage. Please read these in conjunction with my earlier comments given at the pre-application stage (let me know if you need copies of these).

Environmental Statement; Chapter 10: Cultural Heritage

10.3 Consultation

Table 10-1 Comments raised in MSDC Scoping Opinion and further consideration.

This table includes a response to comments made by the MSDC Conservation Officer at pre-application stage in relation to built heritage assets.

I am concerned that the applicants have determined that the impact on the settings and views from the listed buildings to the north of the site does not require further consideration. This seems to be based on an assumption that the development will be substantially or fully screened from view from these buildings and their settings, an assumption apparently being made on the basis of a viewpoint produced next to the crossroads of the B2036, Lower Ridges Road and Paynes Place Farm Road. This viewpoint is at some distance from any of the heritage assets concerned and does not represent a meaningful assessment of the impact of the proposal on their immediate settings and views from them.

From my own on site assessment I would conclude that although the development is likely to be relatively well screened by the existing topography and woodland/tree planting from Paynes Place Farm, Lyes Farmhouse and Lyes Farm Barn, it is less so in relation to the other assets to the north of the site:

- From the immediate setting of Lower Ridges Farm and Lower Ridges Barn there are views looking south east across the valley towards Isaacs Lane which would take in the part of the site adjacent to Paddock Cottage. At this time of year, standing just in front of the farmhouse the traffic on Isaacs Lane is visible, which indicates to me that new housing between the two would

be equally visible, having a significant impact on the current almost uninterrupted rural setting of this group of listed buildings.

- From Hookhouse Farm, there are views looking south west towards this same part of the site, and south east across Isaacs Lane to the part of the site east and north east of Woodfield House including the proposed new secondary school. Again I consider that the impact on the existing character of the building's setting will be significant.

Further action is required on the basis of the applicants to properly assess the impact on each individual asset and to indicate how this impact should be mitigated in a detailed scheme. In particular, verified views should be produced from Lower Ridges Farm, Lower Ridges Barn and Hookhouse Farm, which would allow an accurate assessment of the potential impact of the scheme as currently shown, using the currently available level of information such as building lines and suggested storey heights to the relevant parts of the development.

It is noted that Lowlands Farm barn has been incorporated for retention- attention should also be given to how the setting of this non-designated heritage asset is to be treated. I note that this is mentioned at 6.146 of the Planning Statement.

10.7 Assessment of Effects and Significance.

It follows from the above that the assessment of the level of harm caused during construction and operation of the development on these designated heritage assets (section 10.7) of the document requires reassessment – at present I consider that this is underplayed. This may then result in the need for appropriate redesign and/or mitigation measures in the current proposal and/or further detailed submissions.

In respect of the designated built heritage assets which are within close proximity of the site (Bridge Hall and Firlands) I am concerned that section 10:7 of the document underplays the magnitude of the impact that the development will have long term on the setting of these assets and the manner in which their special interest is appreciated, which will be significant. I am concerned that this will result in a lack of proper weight being attached to mitigation measures in this application and any subsequent detailed submission. This assessment requires reconsideration, with greater weight being attached to the adverse impact of the development on the settings of these two assets.

10.9 Residual Effects and Conclusions

Table 10-6 in this section also requires amendment. To state that the effect of the complete and occupied development on the setting of built heritage assets will be '*Minor adverse not significant*' is in most cases not accurate as it underplays the level of harm which will be caused, and is likely to lead to a lack of proper weight being attached to detailed design and mitigation measures in relation to the settings of these assets.

Planning Statement; Chapter 6: Planning Assessment

Heritage

6.148 As above, I consider that the conclusion that the proposal will have no significant effects on built heritage assets is flawed and may lead to a lack of weight being attached to appropriate design and

mitigation measures in this application and in subsequent more detailed applications. This requires re-assessment. (It should perhaps be noted that the development can have a significant effect without this being deemed substantial in terms of paragraph 195 of the NPPF.)

Design Guide

At pre-application stage I suggested a number of general principles which could be usefully established when considering the mitigation of the impact of the development on the special interest of the nearby heritage assets. Chapter 10 of the Environmental Statement, in response, states that these principles have been carefully considered within the Design Guide, however there is no indication that this is the case, or how these principles have been incorporated into the Guide.

Within the body of the Design Guide, despite the comments made in Chapter 10 of the Environmental Statement, I can find no specific mention of built heritage in general or in relation to the impact on specific assets and how this should be mitigated. As per my earlier comments at pre-application stage this should be an integral consideration of the design process. In particular, I would consider it appropriate to highlight the potential impact on nearby heritage assets in relation to the design, layout and landscaping of each relevant character area, yet this has been completely overlooked.

The Bedelands Corner Character Area includes the non-designated heritage asset at Lowlands Farm Barn which elsewhere the application indicates it is intended to retain. It would be appropriate for this asset to be marked within the Character Area. This building and its setting merit careful consideration within the design and layout of this part of the development, and have the potential to enhance the quality of the finished scheme.

The design and layout of the green spaces within the development, particularly semi-natural green space, hedgerows and trees, will be particularly important to the mitigation of the impact of the proposal on the setting of the adjacent heritage assets- an issue raised several times at pre-application stage. Again, there is no apparent consideration given in the Design Guide to how the green landscaping of the scheme should respond to the setting of nearby heritage assets.

In summary, I consider that

- Aspects of the manner in which the impact of the proposal on the setting of built heritage assets in the vicinity of the site has been assessed are flawed or inaccurate, notably in relation to the assets to the north of the site.
- The impact of the proposal on the rural setting of the built heritage assets and the importance of the existing rural setting to the manner in which the special interest of these assets is appreciated is consistently underplayed in the submission documents.
- This results in a result in a lack of appropriate weight being attached to design and mitigation measures in this application and subsequent detailed proposals.
- The Design Guide fails to make any mention of built heritage or to indicate as appropriate how the design, layout and landscaping of relevant Character Areas should respond to this.

Thanks,

Emily Wade

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