

**Old Estates Yard & Old Vicarage Field, Turners Hill**  
For: Elivia Homes

Ref: 4568

**Note – Response to Conservation Officer  
Comments**

26 September 2025

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## **Introduction**

This note has been prepared by Smith Jenkins Planning & Heritage on behalf of Elivia Homes to respond to comments from Mid-Sussex District Council Conservation Officers (dated 17<sup>th</sup> September 2025) regarding the application proposals (ref. DM/25/1467) for the development at Old Estates Yard & Old Vicarage Field, Turners Hill (hereafter also referred to as ‘the Site’).

The Site is allocated within policy THP2 of the Turners Hill Neighbourhood Plan, which includes the provision of 44 new homes of a mix of dwellings as well as a new village car park. The proposed development has been subject to pre-application discussions with Mid-Sussex District Council (MSDC), and commentary from officers through this process have informed the scheme for the Site.

The pre-application comments from the Conservation Officer requested a detailed Heritage Statement to support the application, and identified assets to be looked at as part of the assessment. In addition, it was requested that an assessment be undertaken to identify any non-designated heritage assets with the potential to be affected by the proposed development, and for more information to be provided on the existing buildings within the Site. This was all undertaken as part of the Heritage Statement (dated April 2025) produced by Smith Jenkins Planning & Heritage.

It is acknowledged that change to the Site will result in change to the setting of the surrounding heritage assets, as well as to the conservation area, and that this is inevitable to achieve the development required by the Site Allocation. However, mitigation through design has been implemented to lessen this impact as far as possible, and an understanding of the heritage sensitivities of the area have informed the application scheme.

We provide a summary of the main points from the Conservation Officer’s comments below, organised by heritage asset, accompanied by our response.

## Summary of Conservation Officer Comments and Response

### Turners Hill Conservation Area

Comment	Response
The proposals will have an <b>'adverse impact on the character of the frontage onto Church Road</b> , which is currently verdant, with the <b>existing houses set well back behind mature hedging and trees.</b> '	Within the Heritage Statement (paragraphs 5.22-5.28), it is acknowledged that the new entrance to the proposed development will alter the experience of Church Road and this part of the conservation area.
'The creation of a the <b>new access breaking through the hedge line</b> , with the associated removal of the existing trees and hedgerow to the site frontage, and regrading of the affected area with terraced banks and retaining walls flanking the access road, will have a <b>fundamental impact on the character of this part of Church Road</b> , which as above is currently verdant, transitional and 'edge of village', especially as the suburban development within the site would consequently be open to view'	This is the required location for new access within the Site Allocation, and mitigation measures, including the provision of additional hedge planting adjacent to the new entrance and more planting behind this, have been introduced to reduce the visibility of the dwellings in views from Church Road. The new housing will additionally be considerably set-back from the road, in line with the existing character of this part of the conservation area, as identified by the Conservation Officer.
This would be <b>'significantly detrimental to the character of the key approach into the centre of the village</b> from the west along Church Road'	Whilst the character of the approach into the village will be altered, it is disputed that this would be 'significantly detrimental', as there is awareness of increasing development moving east from the junction of Turners Hill Road and Church Road, with driveways leading off from both sides of Church Road and built form becoming increasingly visible as one moves towards the centre of the village. The proposals will be a continuation of this existing character.
<b>'significant impact on the character of the approaches</b> to the village centre/Conservation Area <b>along the unclassified (?) path and the PROW running west from Lion Lane'</b>	Within the Heritage Statement, it is acknowledged that the change from an open space to a built site will alter the experience of the conservation area.  In order to meet the requirements of the Site Allocation, there will inevitably result in change to the character of the Site. It should be noted that the proposed development provides fewer units than the 44 requested within the allocation, and this has reduced the density of the built form overall. In addition, the design and layout of the scheme has been informed by pre-application discussions with MDC officers.

Comment	Response
<p>‘the <b>open and verdant nature of the larger part of the site makes a strong positive contribution to the rural character of the setting of the heart of the Conservation Area</b>, and represents a <b>direct connection between the village development and the surrounding countryside.</b>’</p>	<p>Approaches to the village centre from the footpaths to the north of the Site already have an experience of rurality entering into a more built-up area, with awareness of the buildings along Lion Lane in particular in glimpses through the trees and hedging that bound the field to the north of the Site. The dense boundary treatment, as well as the topography of the area falling away considerably to the north, limits long-range views of the Site. It should also be noted that there were historically buildings along the entire eastern side of the Site, within and outside of the conservation area boundary, as evidenced within Section 3 of the Heritage Statement. There has therefore been change to this area of the conservation area and its setting over time, and the full extent of the Site has not remained open and undeveloped.</p> <p>The key experience and understanding of the rural nature of the surrounding area is gained from the changing topography, with extended views to the north down Lion Lane and North Street, as well as views looking south from East Street, including across the carpark of the Crown Public House. These views allow for appreciation of the hill-top nature of the settlement and allowing for expansive vistas across the surrounding countryside. The Site is not a part of these far-reaching, rural, views, and from within the main spaces of the conservation area, including Church Street and Lion Lane, there is limited appreciation of the open nature of the Site, with awareness instead of the built form behind the Old Fire Station and the large trees bounding the Site to the north and west, which will be retained as part of the proposed development.</p>
<p>The proposed 40 dwellings will ‘have a <b>fundamental impact on its nature</b>, as it will become a <b>suburban enclave</b>’</p>	<p>Whilst the proposals will alter the character of the Site area, the connection between the developed area of the village and its rural surroundings will be maintained within the wider vistas. The approaches into the village moving towards St Leonard’s Church from the west and along East Street to the east, will remain as a countryside experience shifting into the more built-up area of Turners Hill.</p>
<p>Concludes <b>less than substantial harm</b> to the conservation area at the <b>higher end of the scale</b></p>	<p>The Heritage Statement acknowledges that harm will be caused to the conservation area as a result of the proposals, however it is disputed that the level of less than substantial harm is at the higher end of the scale. We consider that this would be at the lower end of the scale.</p> <p>As most of the Site lies outside of the conservation area, the majority of the impact is on the setting of the asset, rather than a direct impact on the character and appearance of the built form within the area.</p>

Comment	Response
	<p>Whilst there will be some more awareness of built form in views from Church Road and The Green, awareness of the rural surroundings of the village will continue to be appreciated in the extended views to the north and south, as well as west down Church Road and east along East Street.</p> <p>There is also existing awareness of the current, poor-quality built form within the Site from the Green, and when looking from the Green to all sides, there is a character of the visibility of rooflines and glimpsed awareness of built form extending beyond the historic core, with the wider rural setting appreciable beyond.</p> <p>This includes the development of Clockfield (permitted in 2011) to the north-east, which also lies partly within the conservation area. The openness of the entrance to this development has a marked impact on the experience of the area along this stretch of North Street, and this is what the proposed development seeks to avoid through the retention of as much hedging and new boundary planting as possible.</p> <p>There will be no awareness of the proposals from the majority of Lion Lane, North Street or East Street, and as such the proposals will only impact the south-western side of the wider conservation area.</p> <p>In addition, mitigation measures have been included within the design of the scheme, including the locations and spacing of the proposed dwellings, which are set back from the eastern edge of the site to provide breathing space from the conservation area, as well as the materials and design of the new homes, which have been closely informed by the built form within the conservation area. The demolition of the existing, poor-quality buildings within the Site and the use of this space as a new, landscaped, village car park, will also be an improvement to the existing situation in this part of the conservation area.</p> <p>Due to the localised nature of the impact and the mitigation measures undertaken, <b>the less than substantial harm to the Turners Hill Conservation Area is therefore at the lower end of the scale.</b></p>

***The Old Vicarage & School View (NDHAs)***

Comment	Response
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<p><b>Impact</b> through change to their settings including their gardens and access, which will 'be <b>detrimental to the currently spacious and verdant setting</b>'</p>	<p>Within the Heritage Statement (paragraph 5.35), it is acknowledged that harm will be caused to the two NDHAs due to the substantial alteration of their settings.</p>
<p><b>Mid-high level of harm</b> to buildings of a <b>mid-level and low-level of interest</b> respectively.</p>	<p>It should be noted that NDHAs of any level of interest are still of the lowest level of significance in heritage terms, and have no statutory protection. As per the assessment carried out within the Heritage Statement, the buildings are relatively removed from the wider village due to their set-back nature and enclosure within hedging, and it is their connection to each other that provides the highest contribution to their significance. This will remain in-tact, and as such it is considered that the <b>harm will be at a low level</b>.</p> <p>It should also be noted that the proposals will open up the front of the plot of the Old Vicarage, and will allow it to be better revealed within the streetscape of Church Road and for more appreciation of the building and its features of interest.</p>

***The Old School House, 31 Church Road (Grade II)***

Comment	Response
<p>'This will <b>deduct</b> from the manner in which its <b>special interest (historical illustrative and communal values)</b> as a <b>former village school will be appreciated</b>, as well as its <b>aesthetic value</b>'</p>	<p><b>Setting</b></p> <p>As discussed within the Heritage Statement, the elements of the building's setting that provide a continued awareness of its historic rural setting are the open fields appreciable alongside the building to the west and south, with increased built form leading into the village centre to the north-east.</p> <p>Due to the density of the hedging and trees that line the north side of Church Road, there is no appreciation of what lies beyond this from the listed building, and as such it is the enclosed, green nature of this space that forms the setting to this side of the asset.</p> <p>The appreciation of the building as a marker of the entrance into the village from the west, as well as its connection to the existing primary school, are the key ways in which its 'historical', 'illustrative' and 'communal' values are appreciated, and this will not be altered as a result of the proposed development, as the line of hedging to the north of Church Road across from the listed building will be retained, shielding inter-visibility between the asset and the new dwellings, and the former school house will remain the principal street-fronting presence within the approach to the village from this side.</p>
<p>Impact '<b>exacerbated</b>' by the <b>site access</b>.</p>	

	<p>The Site entrance will lie across from the existing primary school to the east. Whilst some greenery will be lost to form the gap to allow access into the Site, this will not be within the immediate vicinity of the listed building, and more will be planted to the north-west of the entrance. The new entrance will be viewed as one of a number of openings within the hedging along this side of Church Road, identifying the residential nature of the settlement as proximity to the village centre increases.</p> <p><b>Aesthetic Value</b></p> <p>The aesthetic value of the building is gained from its architectural detailing and simple, Georgian design. There is no impact on this as a result of the proposals.</p>
Concludes <b>less than substantial harm</b> within the <b>middle range</b> .	<p>As the elements of the building's setting that contribute to its significance will be retained, and appreciation of its special architectural and historic interest will not be altered, it is considered that <b>the significance of the listed building will be preserved</b>.</p> <p>If the Case Officer were to agree with the Conservation Officer Comments and conclude less than substantial harm, the fact that the interest of the building will remain fully appreciable, and it will remain within its existing rural context as a marker into the village, means that any harm must be at the very low end of the scale of less than substantial.</p>

**Old Forge Cottage (Cottage belonging to Paddockhurst Estate) & Forge House (both Grade II)**

Comment	Response
Proposals will have a ' <b>suburbanising impact</b> on their <b>settings and the context</b> in which they are viewed'.	The Heritage Statement acknowledges (paragraphs 5.30 to 5.31) that there will be impact upon the listed buildings as a result of change to their wider settings.
Impact also on 'the <b>outlook from the buildings themselves</b> , which will be affected by both <b>new dwellings</b> and a fairly extensive area of <b>car parking</b> which is proposed to the south east corner of the site'.	As discussed within the conservation area assessment above, in order to meet the requirements of the Site Allocation, change to the character of the Site will be inevitable. Again, it should be noted that the proposed development provides fewer units than the 44 requested within the allocation, and this has reduced the density of the built form overall. In addition, the design and layout of the scheme has been informed by pre-application discussions with MDC officers.
'as rural village buildings, illustrative of a former rural light industry, this suburbanising impact will have a <b>detrimental impact</b> on the <b>manner in which their special interests are appreciated</b> , and in particular their <b>historical illustrative, aesthetic and communal values</b> '.	<p><b>Setting</b></p> <p>In order to understand the level of impact, the contribution made by the various elements of the setting of the buildings is essential.</p>

	<p>The two listed buildings are primarily, and best, experienced within the context of Church Road and North Street, as they front onto this space and form landmark buildings within the village centre due to their corner position. This is also where appreciation is gained of their connection to each other and the rest of the historic buildings within the village, which is the key element of their setting that contributes to their significance, and where their historical and communal values are understood.</p> <p>There is already awareness of development to the rear of the two buildings as a result of the later fire station, hardstanding, and the 20<sup>th</sup>-century workshops and storage buildings that sit in this location. This has changed the former open space directly adjacent to the buildings, and alongside other later development to all sides, has resulted in them being experienced within a much more developed setting than they had originally. They are now appreciated as buildings within an expanded village settlement, rather than as part of a small cluster of rural built form within the countryside.</p> <p>There will be no change to the area closest to the rear of the buildings as this is outside of the red line, and where the new village car park is proposed to the north, this is an area already consisting of hardstanding and used for informal parking, which will be improved through the landscape approach proposed within the application scheme.</p> <p>The loss of open space within the wider setting of the buildings will have a further impact on the appreciation of their historic open setting, however as this has already been eroded, it only currently makes a minimal contribution to the significance of the assets.</p> <p><b>Aesthetic Value</b></p> <p>The aesthetic value of the buildings is gained from their vernacular architectural detailing and characterful design, which is enhanced when the buildings are viewed together from Church Road and North Street. There is no impact on this as a result of the proposals.</p>
<p>Concludes <b>less than substantial harm</b> within the <b>middle range</b>.</p>	<p>It is agreed that <b>less than substantial harm</b> will result to the significance of buildings as a result of the proposed development. However, as the buildings maintain their connection to each other and the rest of the village centre, and the impact will be limited to the already altered wider setting, this is at the <b>low end of the scale</b>.</p>

**115-116 and 117-118 The Bank (both Grade II)**

Comment	Response
<p>The <b>buildings are seen with the Site</b> behind in <b>views from The Green and North Street</b>.</p> <p>‘the <b>suburbanisation of their settings</b> and the severing of the <b>currently close relationship between the buildings and the surrounding countryside</b> will be <b>detrimental</b> to their special interests and the manner in which these are appreciated, in particular their <b>historical illustrative and aesthetic values</b>’.</p>	<p>The Heritage Statement acknowledges (paragraphs 5.30 to 5.31) that there will be impact upon the listed buildings as a result of change to their wider settings.</p> <p>As discussed above, in order to meet the requirements of the Site Allocation, change to the character of the Site will be inevitable. Again, it should be noted that the proposed development provides fewer units than the 44 requested within the allocation, and this has reduced the density of the built form overall. In addition, the design and layout of the scheme has been informed by pre-application discussions with MDC officers.</p> <p><b>Setting</b></p> <p>In order to understand the level of impact, the contribution made by the various elements of the setting of the buildings is essential.</p> <p>The two listed buildings are primarily, and best, experienced within the context of North Street and the green, as they front onto this space and form landmark buildings within the village centre due to their raised standing. This is also where appreciation is gained of their connection to each other and the rest of the historic buildings within the village, which is the key element of their setting that contributes to their significance, and where their historical and communal values are understood.</p> <p>The area of the Site closest to the rear of the buildings is currently in a poor condition, with hardstanding, informal vehicle parking and the 20<sup>th</sup>-century low-quality workshops and storage buildings. This is proposed to be replaced by a landscaped village car park, to meet the requirements of the allocation, and will be an improvement to the existing situation.</p> <p>As with the neighbouring cottages discussed above, the introduction of the fire station and other built form to the rear of the listed buildings has changed the former open space that they previously backed onto. There were also historically buildings along the entire eastern side of the Site, as evidenced within Section 3 of the Heritage Statement. There has therefore been change to this area of the buildings’ setting over time, and it was not fully open and rural even before the construction of the fire station and existing outbuildings.</p>



	<p>The changes to the rear, alongside the other later development to all sides of the village core, means that the buildings are experienced within a much more developed setting than they had originally. It is important to acknowledge that, whilst historically part of a rural, low-density cluster of development, they are now appreciated as historic buildings within an expanded village settlement.</p> <p>The proposed new dwellings will be a maximum of 2 storeys, and will as such sit lower than the 3-storey listed buildings along The Bank, and the layout of the development has been designed to push development back from the eastern edge of the Site away from the listed buildings. Where there may be glimpsed visibility of the roofscape of the new dwellings in the gaps between and adjacent to the assets when looking from the green, this will not alter the prominence of the buildings in these views. Appreciation will additionally remain of the treeline beyond, allowing continued understanding of the green nature of the surroundings.</p> <p>The loss of open space within the wider setting of the buildings will have a further impact on the appreciation of their historic open setting, however as this has already been eroded, it only currently makes a minimal contribution to the significance of the assets.</p> <p><b>Aesthetic Value</b></p> <p>As with the adjacent cottages, the aesthetic value of the buildings is gained from their vernacular architectural detailing and characterful design, which is enhanced when the buildings are viewed together from North Street and the green. There is no impact on this as a result of the proposals.</p>
Concludes <b>less than substantial harm</b> within the <b>middle range</b> .	It is agreed that <b>less than substantial harm</b> will result to the significance of buildings as a result of the proposed development. However, as the buildings maintain their connection to each other and the rest of the village centre, and the impact will be limited to the already altered wider setting, this is at the <b>low end of the scale</b> .

**The Red Lion (Grade II)**

Comment	Response
Potential visibility of the proposals from the building and its garden.	<b>Setting</b>

<p><b>Impact on the rural character of the backdrop of the view</b> when appreciated from <b>Lion Lane</b></p>	<p>In order to understand the level of impact, the contribution made by the various elements of the setting of the buildings is essential.</p>
<p><b>Adverse effect</b> 'on the <b>currently rural character</b> of the <b>approach to the public house</b> along the adjacent' public right of way.</p>	<p>As discussed within the Heritage Statement (page 19), the public house is bounded to the west by a border of dense trees and vegetation. Even in winter months, this boundary treatment, which also runs to the north and south of its plot, serves to form an enclosed setting for the building, and emphasises its connection to Lion Lane to the east, from which the pub is best experienced as a building serving the local community in conjunction with the residential buildings along the road. This is where the historic and communal value of the building is best appreciated.</p>
<p>'this will be <b>detrimental to its special interest</b>, in particular its <b>historical illustrative, aesthetic and communal values</b>'</p>	<p>There is minimal, if any, awareness of the public house from the public right of way to the west due to the dense vegetation, and this is therefore not a key approach to the pub and there is no appreciation of a current. Whilst there will be a change in character to this side as a result of the development, it will not alter the appreciation of the public house or the areas of its setting that contribute to its significance (being its connection to the village and Lion Lane). In addition, the existing boundary planting to the north of the Site will be retained; screening much of the development and softening it within views from this side.</p> <p>In terms of visibility of the proposals in views of the pub from Lion Lane, it should be noted that the area of the Site closest to the pub is currently used for car parking and will remain in this use. The proposed built form is set well back from the north-western corner of the Site, further south than the neighbouring property adjacent to the pub along Lion Lane. Due to the distance and height of the proposals, as well as the vegetation bounding the pub and the Site, it is very unlikely that any built form will be visible behind the pub in views up the lane. If there were to be any visibility, this would be heavily screened by the boundary vegetation, and would be seen in conjunction with the other built form up Lion Lane. This would not alter the appreciation of the interest of the listed building.</p> <p><b><i>Aesthetic Interest</i></b></p> <p>The aesthetic value of the public house is gained from its traditional, symmetrical 18<sup>th</sup>-century frontage as well as the surviving 16<sup>th</sup>-century features internally. There is no impact on this as a result of the proposals.</p>
<p>Concludes <b>less than substantial harm</b> within the <b>middle range</b>.</p>	<p>As the elements of the building's setting that contribute to its significance will be retained, and appreciation of its special</p>

	<p>architectural and historic interest will not be altered, it is considered that <b>the significance of the listed building will be preserved.</b></p> <p>If the Case Officer were to agree with the Conservation Officer Comments and conclude less than substantial harm, the fact that the interest of the building will remain fully appreciable, and it will remain within its existing rural context as a marker into the village, means that <b>any harm must be at the very low end of the scale.</b></p>
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**Old Fire Station (NDHA)**

Comment	Response
<p>'the <b>proximity of the site to the rear</b>, and the <b>suburbanising impact</b> of the development will in my opinion <b>detract from the rural village setting</b> of this NDHA'</p>	<p>It should be noted that NDHAs of any level of interest are still of the lowest level of significance in heritage terms, and have no statutory protection.</p> <p>In terms of the proximity of the Site, there is already built form to the rear of the fire station in the form of the 20<sup>th</sup>-century workshops and garaging, which has severed any connection between the asset and the open fields beyond. The existing built form, as well as other buildings subsequently demolished, have sat to the rear of the fire station since its construction and it has therefore never been experienced with an open setting to the rear.</p> <p>The building itself is appreciated along the thoroughfare of Church Road as a building within the centre of the settlement, intended to serve the local community. Its connection to the surrounding built form and the road are therefore the elements of its setting that contribute the highest to its significance, and it has always been experienced with built form to the rear.</p>
<p>Concludes <b>harm at a mid-high level</b> to an asset of <b>mid-high interest</b>.</p>	<p>As the elements of the building's setting that contribute to its significance will be retained, and appreciation of its architectural and historic interest will not be altered, it is considered that the <b>significance of the NDHA will be preserved.</b></p> <p>If the Case Officer were to agree with the Conservation Officer Comments and conclude harm, the fact that the interest of the building will remain fully appreciable, and it will remain within its existing context as a building serving the local community within the centre of the village, means that <b>any harm must be very low.</b></p>

**Turners Hill CofE Primary School (NDHA)**

Comment	Response
‘the <b>semi-rural, village setting</b> of the NDHA will be <b>adversely impacted</b> by the creation of the <b>new access</b> through the road frontage which would be directly opposite the school’	<p>It should be noted that NDHAs of any level of interest are still of the lowest level of significance in heritage terms, and have no statutory protection.</p> <p>The primary school is currently viewed within the context of the busy junction of Church Road and North Street/Selsfield Road. Whilst there are open fields to the west of the school, the roads that bound it to two sides and the buildings on all sides of the junction give it a distinct village-centre character, and due to the density of the tree planting to the south in particular, it is not experienced as a building within a rural or semi-rural setting.</p> <p>As discussed within the Heritage Statement (paragraph 5.34), whilst the new entrance to the Site will change the setting of the building to the north, it is already experienced within a residential, village-centre context, and the openness of its plot will ensure that it retains its prominence within Church Road.</p>
Concludes <b>harm to a mid-high level</b> to an <b>asset of mid-high interest</b> .	<p>As the elements of the building’s setting that contribute to its significance will be retained, and appreciation of its architectural and historic interest will not be altered, it is considered that the <b>significance of the NDHA will be preserved</b>.</p> <p>If the Case Officer were to agree with the Conservation Officer Comments and conclude harm, the fact that the interest of the building will remain fully appreciable, and it will remain within its existing context as an educational building within the centre of the village, means that <b>any harm must be very low</b>.</p>

**Providence Terrace (NDHA)**

Comment	Response
The proposals would ‘have a <b>marked impact on their rear outlook</b> ’ and possibly the <b>backdrop of views of the NDHA</b> from The Green	<p>It should be noted that NDHAs of any level of interest are still of the lowest level of significance in heritage terms, and have no statutory protection.</p> <p>As discussed within the Heritage Statement (page 24 and paragraph 5.37), the terrace has a village-centre context, and appreciation is retained of its setting within the other, older, buildings that form the core of the village. Census records additionally indicate that it has always been in retail use, and</p>

	<p>as such its connection to the rest of the built form in the village is the element of its setting that contributes the highest to the building's significance.</p> <p>The Heritage Statement acknowledges that there may be some visibility of the roofscape of the proposed development in views from the east looking towards the NDHA, however this will have no impact on the appreciation of the building as a retail unit within a village centre context, or the architectural features of its front elevation, which are where its significance is gained.</p>
Concludes a <b>mid-level of harm</b> to an asset of <b>low-mid interest</b> .	<p>As the elements of the building's setting that contribute to its significance will be retained, and appreciation of its architectural and historic interest will not be altered, it is considered that the <b>significance of the NDHA will be preserved</b>.</p> <p>If the Case Officer were to agree with the Conservation Officer Comments and conclude harm, the fact that the interest of the building will remain fully appreciable, and it will remain within its existing context as a commercial building within the centre of the village, means that <b>any harm must be very low</b>.</p>

**Summary of Conclusions on Impact**

Asset	Conservation Officer Conclusion	Smith Jenkins Conclusion
Turners Hill Conservation Area	Less than substantial harm – at the higher end of the scale	Less than substantial harm – at the low end of the scale
The Old Vicarage & School View (NDHAs)	Harm – at a mid level	Harm – at a low level
The Old School House (Grade II)	Less than substantial harm – at the middle of the scale	Preserve
Old Forge Cottage & Forge House (Grade II)	Less than substantial harm – at the middle of the scale	Less than substantial harm – at the low end of the scale
115-116 & 117-118 The Bank (Grade II)	Less than substantial harm – at the middle of the scale	Less than substantial harm – at the low end of the scale
The Red Lion (Grade II)	Less than substantial harm – at the middle of the scale	Preserve
Old Fire Station (NDHA)	Harm – at a mid-high level	Preserve
Turners Hill CofE Primary School (NDHA)	Harm – at a mid-high level	Preserve

Providence Terrace (NDHA)	Harm – at a mid level	Preserve
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### **Impact on Assets**

We note that the Conservation Officer concludes that the proposals would cause an element of harm to the Turners Hill Conservation Area, the Grade II listed Old Forge Cottage, Forge House, 115-116 and 117-118 The Bank, and the non-designated The Old Vicarage and School View. Harm to these assets is agreed, and this was concluded within the Heritage Statement, however it is disputed that the harm to these assets is at the level suggested within the Conservation Officer Comments, for the reasons discussed in detail above, and is at a low level for all of these assets.

In addition, we note that the Conservation Officer also concludes that there would be an element of harm to the Grade II Old School House and Red Lion, as well as the non-designated Turners Hill CofE Primary School, The Old Fire Station and Providence Terrace. This is also disputed, again for the reasons discussed above, and we consider that the significance of these assets will be preserved. There is no discussion of the Grade II listed The Crown Public House, which is assessed in the Heritage Statement, within the Conservation Officer Comments. It is therefore assumed that there is no impact concluded on this asset, which is in line with the findings of the Heritage Statement.

It must be noted that change or the visibility of a scheme does not automatically equate to harm, and an understanding of the existing appreciation of the significance of a heritage asset is essential for identifying impacts. The Conservation Officer discusses that the village has a rural character, and whilst this is agreed in terms of the far-reaching views that are appreciable to the north and south, as well as the awareness of open fields to the east and west as one approaches the settlement, once one is within the village centre, there is a much more residential, community-focused character, with awareness of residential development stretching away from the historic core.

### **Approach to Harm & Decision Making**

Whilst we do not concur with the conclusions of the Conservation Officer's assessment in terms of the level of harm to the conservation area, listed buildings along The Bank and the non-designated Old Vicarage and School view, or in terms of harm resulting to the listed Old School House and Red Lion and the non-designated primary school, fire station and Providence Terrace, it must be noted that heritage harm should not automatically equate to a refusal.

It must be noted that the engagement of the paragraphs of the NPPF requires different approaches. Paragraph 215 (applicable to less than substantial harm to designated heritage assets) requires a balance of harm against benefits, whereas paragraph 216 (applicable to non-designated heritage assets) is concerned with a balanced judgement having regard to the scale of any harm and the significance of the asset. In respect of the latter, this reflects the lower level of significance for non-designated heritage assets. As the NPPF advocates, any harm can be balanced against the wider public benefits of the scheme. Public benefits are defined in paragraph 8 of the NPPF and are considered to be anything that meets environmental, economic and social objectives.

### ***Designated Heritage Assets***

In considering 'less than substantial' harm to the designated heritage assets, and as defined by high court judgements and appeal decisions, great weight should be given to the statutory duty, particularly that special consideration should be given to preservation of the asset. It has been established by high court judgements and appeal decisions that consideration should also be given to the means through which that harm can be minimised and mitigated. In this case, and as set out in the Heritage Statement and Design and Access Statement, mitigation is built into the design. That is, that during design development, when an adverse impact has been identified, consideration has been given as to how that impact can be reduced and whether it is absolutely necessary to deliver the scheme and the identified public benefits. In this case, this iterative process has been undertaken, with acknowledgement that change is inevitable to the Site in order to meet the requirements of the Site Allocation as per policy THP2.

### ***Non-Designated Heritage Assets***

The NPPF does not set out a requirement to quantify the level of harm to an NDHA in order to undertake the balanced judgement, however the officer has identified mid and mid-high harm to the identified assets, and we have identified low harm to the Old Vicarage and School View. If the Case Officer were to agree that harm is caused to some or all of the non-designated assets, the scale of the limited harm and the low significance of the assets as NDHAs should be considered as part of the balanced judgement.

The public benefits arising from the proposed development, as laid out in the Planning Statement and Design and Access Statement, as well as the requirements of the Site Allocation, should also be referred to in order to assist with the balancing exercise.

### **Summary and Conclusions**

This note has been prepared on behalf of Elivia Homes to address comments raised within the Conservation Officer Consultee Response concerning the potential heritage impacts of the proposed development of Old Estates Yard and Old Vicarage Field in Turners Hill, an allocated site as part of the Turners Hill Neighbourhood Plan. The Conservation Officer's comments concerning each heritage asset have been taken in turn and responded to, followed by an overview of the potential impacts of the scheme and how any impact should be approached in order to comply with the policy requirements of the NPPF.

The Conservation Officer has identified harm to the Turners Hill Conservation Area and the majority of the surrounding listed buildings and non-designated heritage assets. It is accepted that a level of harm will occur to the conservation area, the Grade II listed buildings of Forge Cottage, Forge House, 115-116 The Bank, 117-118 The Bank, and the non-designated Old Vicarage and School View, however the level of harm is disputed and, as the village is no longer appreciated as a completely rural settlement and the assets all gain their key significance from the core of the village and its residential and communal character. It should also be noted that the majority of the Site lies outside the conservation area, and the proposals involve the removal of the existing poor-quality development which has already altered the setting of many of the assets. In addition, mitigation measures, including sensitive design, planting and reduced density compared to the allocation requirements, ensure any impacts are limited and localised. Where impact does occur, the assets will retain their primary heritage values, including their architectural character, historic connections, and role within the village streetscape, and therefore any harm must be at a low level.

Visibility or change does not automatically constitute heritage harm. The decision maker should take account of the requirements within the NPPF for harm to designated heritage assets to be weighed against public benefits (paragraph 215) and for a balanced judgment to be undertaken when harm is concluded to non-designated heritage assets (paragraph 216).

***Paul Crisp – Director***

***Sophie Waite – Senior Consultant***

***For and on behalf of Smith Jenkins Planning & Heritage***

***26<sup>th</sup> September 2025***