

**From:** Emily Wade <Emily.Wade@midsussex.gov.uk>  
**Sent:** 02 July 2024 15:35:50 UTC+01:00  
**To:** "Deborah Lynn" <Deborah.Lynn@midsussex.gov.uk>  
**Subject:** DM/22/1778 and 1880 81 High Street, East Grinstead

Hi Debbie

Further comments on the above application.

As you know, we attended site again last week but were again unable to access part of the building affected by the proposal (the room in use as the dining room to the staff accommodation). This, in combination with the continuing inadequacy of the Heritage Statement submitted with the application (last updated on 25<sup>th</sup> January), leaves me in a position where I am unable to comment with any confidence on the impact of the proposed internal works on the special interest of the listed building.

There are certain works forming part of the proposal which are potentially of particular concern:

- Insertion of a partition within the dining room of the staff cottage, which is suggested to become part of the proposed new flat, to create a shower enclosure. This affects the proportions and plan form of the dining room, which from the limited information in front of us is potentially in its original dimensions. However, in the absence of an appropriately detailed HS and access to the space it is not possible to comment on whether this is the case, or hence on whether the proposal will have any adverse impact on the special interest of the building.
- The creation of two new openings in the walls to this room- one to the northern side, to extend the existing WC to create a shower room, taking in (as noted above) part of the existing staff cottage dining room, and one to the western side, to create access between the existing corridor along the western side of the building and the remainder of the dining room, which is proposed to become the flat's kitchen diner. We have no information in front of us as to the date or level of interest of the fabric affected, and have only been able to view the area from one side. The submitted Heritage Statement states that the proposal results in the creation of one new opening (in fact it is two), which is described as a *'small door opening in what appears to be the original wall, it is difficult to definitively confirm this as the building has been altered and extended.'* Again, it is not possible to comment in these circumstances on whether this aspect of the works will adversely affect the historic fabric or special interest of the building.
- Partial raising of the floor level within the existing corridor to the west of the staff accommodation dining room, with insertion of a partition to hive off part of the space as part of the new flat, and creation of steps down from this area into the new kitchen diner, via the opening described above. At present, there is a marked change in floor level between the front and rear of the building, which one might speculate could reflect stages in the building's development, and could be significant to the narrative of the building and how this can be read. However, in the absence of an appropriately detailed HS it is not possible to determine whether this is the case, or consequently whether this aspect of the proposal will adversely impact its special interest.

For clarity, and as previously requested, an appropriately detailed heritage statement would in this instance be based on a historic building survey carried out by a qualified and experienced historic building archaeologist which would identify the phases of development of the building,

and the significance of its plan form and surviving historic fabric in this context. Based on this, the statement would comment on the impact of the current proposals on the special interest of the building. The statement which we have in front of us is not based on a survey of the building and does not contain the information which we would require for a properly informed consideration of the proposal.

The application as submitted is contrary to the requirements of District Plan Policy DP34, which states in part that:

*'Development will be required to protect listed buildings and their settings. This will be achieved by ensuring that:*

- A thorough understanding of the significance of the listed building and its setting has been demonstrated. This will be proportionate to the importance of the building and potential impact of the proposal;*
- Alterations or extensions to a listed building respect its historic form, scale, setting, significance and fabric...'*

It will also be contrary to paragraph 200 of the NPPF which states that:

*'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.'*

Given the inadequacy of the application submission and that I have identified above several potential areas of concern in terms of the impact of the current proposal on the special interest of the building, I would recommend that the application is now refused.

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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Submit your planning application online.

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