



Fuller Long - HEA
Build Studios
203 Westminster Bridge Road
London
SE1 7FR

Emily Wade
Conservation Officer – Mid Sussex District Council
Emily.Wade@midsussex.gov.uk

25/08/2026

Our Ref: 02558

Re: St Stephen's Church, Horsted Keynes - Conservation Officer Comments Rebuttal

Thank you for the comments provided, as we understand the initial pre-formal assessment concludes that St. Stephen's Church should be regarded as a non-designated heritage asset (NDHA) of low to moderate significance. Whilst it is accepted that the redundant Church holds a degree of local historic interest as a former place of worship and forms part of the 1970's architectural expansion of Horsted Keynes, the council's current position overstates both its architectural significance and its contribution to local character. Indeed, the current building in form detracts from the setting.

We note the 2026 National Planning Policy Framework (NPPF) makes clear that heritage assets are an *irreplaceable resource* and that decisions should be based upon a proportionate assessment of their significance. We would highlight that importantly, paragraph HE7 of the NPPF requires that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, with a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset. In this respect, the level of significance attributed to St Stephen's Church is limited. The building is neither designated nor identified within any adopted local list, nor has it been recognised as possessing the special architectural or historic interest required for any statutory designation. While the age of the structure alone is not determinative, the building dates from 1970 and represents a modest example of standard late 20th-century ecclesiastical architecture of its period rather than an innovative or distinguished design that is of any merit.

The architectural form of the church is functional and austere. Its steeply pitched roof, plain elevations with fletton brick and architectural detailing reflect a pragmatic approach to post-war church design of the 1970's rather than a building of particular architectural distinction. Whilst these characteristics may typify aspects of ecclesiastical architecture of the late twentieth century, they do not, in themselves, represent a level of architectural quality that warrants significant heritage weight.

Historic England's Advice Note 7 recognises that representative examples of a building type may possess local heritage value, but also makes clear that designation should be informed by the extent to which an asset demonstrates architectural, historic, aesthetic or communal interest. In this instance, the church is an unexceptional example of a common post-war building type and lacks the architectural innovation, craftsmanship or artistic quality that would elevate its significance beyond a modest local level. Furthermore, although the church forms part of the wider 1970s residential estate, its architectural expression sits at odds and in contrast with the established vernacular character that defines Horsted Keynes Conservation Area. Rather than reinforcing the distinctive qualities of the village, the building presents as an inward-looking and utilitarian structure whose austere architectural language is at odds with the prevailing character. Its scale, massing and stark appearance do not positively contribute to the wider townscape and instead represent an isolated example of a late 20th century development that is generally regarded as having made a neutral, rather than positive, contribution to local character.

The Planning Practice Guidance advises that the conservation of heritage assets should not prevent well-designed change where this would better reveal or enhance significance, and that decision-makers should consider both the significance of the asset and the contribution that replacement development can make to local character. It also recognises that not every older building will merit retention solely by virtue of its age or former use.

The proposed redevelopment provides an opportunity to replace an architecturally limited and redundant building with a high-quality residential scheme that responds more sympathetically to the established character of Horsted Keynes. Through careful consideration of scale, materials, detailing and landscaping, the proposal has the potential to create a development that better reflects the traditional grain and appearance of the village whilst respecting the surrounding residential context.

In contrast to the existing building, the proposed dwellings would reinforce the domestic character of Hamsland, improve the visual quality of the site, and create a more coherent relationship with surrounding development. Enhanced landscaping and the removal of the visually austere church building would provide an overall enhancement to the street scene and improve the transition between the twentieth-century residential expansion and the historic village beyond.

With regard to the setting of the Horsted Keynes Conservation Area, you note that the application site currently makes a neutral contribution to its significance. Any identified harm is assessed as being at the very lowest end of the "harm" level. Given this assessment, we would highlight the proposed development has been sensitively designed as a replacement development, using sympathetic materials and landscaping, and has the capacity to enhance the wider setting of the Conservation Area by replacing a building of limited architectural merit with development that is more reflective of local character. Whilst there will be a small increase in the density of the proposed development, any perceived harm of built form has been minimised by sensitive design, appearance, and landscaping, along with a substantial distance from the nearby listed building Wyatts.

We would respectfully highlight that paragraph HE2 of the NPPF requires local planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. The proposed development presents precisely such an opportunity. Rather than perpetuating a redundant and architecturally modest building whose contribution is, at best, limited, the proposed scheme offers the opportunity to deliver a high-quality residential development that improves the appearance of the site and makes a more positive contribution to the character and appearance of the locality, especially since the building is redundant and has no function.

Overall, we would ask the LPA to consider that whilst it is accepted that the loss of St Stephen's Church should be afforded appropriate consideration as the removal of a building with limited local heritage interest, the weight attached to that loss should be correspondingly modest. When balanced against the opportunity to secure a well-designed scheme that enhances the quality of the street scene, reinforces local distinctiveness and contributes positively to the wider setting of Horsted Keynes, the proposal accords with the heritage objectives of the NPPF. The resulting public benefits and townscape improvements are considered to outweigh the limited loss of significance associated with the demolition of a building of relatively modest heritage value, and where the increase in density for any perceived harm has been outweighed by the clear public benefits.

Yours sincerely,

Anske Bax BA(Hons) MSc, PhD Candidate
Heritage Director
M: 08081 641 288
E: a.bax@hea-llp.com

