

Our ref: WSMS/CD/240325

20 Farringdon Street
London
EC4A 4AB
T +44 20 72 80 3300

Date: 24 March 2025

Emily Wade
Mid Sussex District Council
Oaklands, Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

For the attention of Emily Wade

DM/25/0014, 0015, 0016 and 0017 Land west of Turners Hill Rd

This letter responds to your comments of 04/03/25 in respect of DM/25/0014, 0015, 0016 and 0017 Land west of Turners Hill Rd for 200 dwellings on the five fields to the south of Huntsland, and 150 dwellings on the two fields to the north, with associated accesses, internal roads, car and cycle parking, open space and play facilities, and hard and soft landscaping.

Overview

The 'Site' comprises seven fields, two fields to the north and five fields to the south of Huntsland. Where intervisibility concerns a specific field, this is referred to (Please find the comprehensive illustrative masterplan attached for reference).

A detailed examination of the Historic Environment Record (HER) was carried out, in addition to two extensive Site surveys and walkovers of the local area (14 November 2024 and 20 March 2025).

The Site does not contain any designated or non-designated built heritage assets and the majority of the built heritage assets within the local area were able to be scoped out from further analysis due to the facts that their historical associations, settings or significance are not reliant upon the proposal site or they remain well removed and/or screened from it due to extant residential development and/or interceding vegetation.

Six Grade II listed buildings were, however, considered to require further assessment for any potential effects of the future development of the Site on their settings or significance. These comprise: Lemon Meadow Yew Tree Cottage (NHLE Ref: 1182671) and The Wallage (1025538) both located beyond the south-east boundary of the Site; Heatherwood South and Heatherwood West (Formerly Oaklawn) (NHLE Ref: 1393329), East Cottage Farthings (NHLE Ref: 1025533) and Leigh Wood (NHLE Ref: 1182619) all located beyond the Site's eastern boundary and Westlands (NHLE ref: 1284416) located beyond the Site's northern boundary line. All six built heritage assets comprise residential dwellings with private gardens of variable size with vegetation. We understand that the Council wish that the grouping at Huntslands be taken into consideration as a non-designated built heritage asset. These buildings receive less protection within the planning system than designated heritage assets

Legislation and National and Local Planning Policy

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states '*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*'.

Paragraph 207 of the National Planning Policy Framework states '*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*'.

Paragraph 215 states '*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*'.

Paragraph 216 states: '*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset*'.

The definition of a heritage asset is provided on Annex 2 of the NPPF: '*A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*'.

The definition of the setting of a heritage asset is provided in Annex 2 of the NPPF: '*The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*'.

Planning Policy Guidance (Paragraph 39) states that '*Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets*'.

Local Planning Policy DP34 Listed Buildings and Other Heritage Assets - Listed Buildings: '*Development will be required to protect listed buildings and their settings. Other Heritage Assets: The Council will seek to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the character and quality of life of the District*'.

Historic England's *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (2nd edition, December 2017) was referred to in the assessment of relevant built heritage assets in respect of the Proposed Development.

Significance

The six listed buildings vary in date from the sixteenth to the early nineteenth century. Their significance lies in the architectural and historical special interest of their fabric and form and in the case of East Cottage/Farthings and Leigh Wood their group value due to architectural style and proximity. Heatherwood South and Heatherwood West is also the first major independent commission by the Scottish architect Thomas Maclaren. The special interest of these buildings is recognised in their individual listings at Grade II.

LAND TO THE WEST OF THE A507 BETWEEN COTTERED AND CROMER, HERTFORDSHIRE, SG9 9PU

The Huntsland grouping is located in close proximity to Fields Three, Four, Five and Six of the Site. It comprises a Victorian house that was reconstructed around the shell of an earlier (circa 1811) Regency property by the naturalist John Russell Reeves (probably in the mid-nineteenth century). There are a group of buildings to its west that contain some older fabric relating to a medieval/post-medieval farmstead. The significance of this non-designated built heritage asset relates to its architectural character and features and the number of important owners the house has had. We do not consider that this grouping is readily perceptible as a former farm, rather it is able to be read as a former country estate.

Settings

The relevant properties are either private residential dwellings or in the case of Huntslands a hotel and wedding venue. They are all set within gardens/grounds of variable size, often with significant vegetation, and have hard standing for private car parking/garages. The wider settings of the respective properties comprises Crawley Down Village (to east) (residential development, retail outlets, schools, leisure facilities and associated highways/infrastructure) and an expansive rural setting to west.

Contribution of Setting and the Study Site to Significance

The private garden settings of the relevant listed buildings make positive contributions to their significance as forming part of their historical settings. However, in the cases of East Cottage/Farthings and Leigh Wood, this contribution is minimal due to the changes that have taken place in close proximity to the properties – they are enclosed by Sandy Lane to north and proximate residential development to south. The remaining built heritage assets have retained larger plots which make positive contributions to their significance as indicative of their former historical settings.

The wider settings of the listed buildings make no contribution to their settings or significance in the case of Lemon Meadow Yew Tree Cottage; The Wallage; Heatherwood South and Heatherwood West (Formerly Oaklawn) East Cottage Farthings and Leigh Wood. The wider setting of Westlands makes a minor positive contribution only to its setting and significance in respect of the fields and woods located to its south-west, as indicative of its former historical setting; the Worth Tithe map of 1843 evidences that the property and its immediately adjacent land were in different ownership than the Site.

In respect of the non-designated built heritage asset, although there have been some changes to the grounds forming the immediate setting of Huntslands, the current layout could be said to be mostly reminiscent of how a country estate would lay out its grounds - expansive, attractive and undulating landscaping leading down to a small pond and jetty; however it is necessary to note that the 1874 Ordnance Survey map evidences that there were a significant number of trees planted to the south of the property, thus it would not have readily maintained any intervisibility with its wider setting beyond its southern boundary line. This map also evidences that the northern part of Field 5 was completely planted with trees that are shown as removed by the time of the 1992 Ordnance Survey Map. The immediate setting of Huntslands is assessed as making a major positive contribution to its significance. The immediate setting of the farm buildings appears to have been somewhat altered and is laid out in the style of 'contemporary' gardens; as such their immediate setting is assessed as making a minor positive contribution only to their significance as indicative of their historical setting.

In respect of the wider setting of Huntslands, it is necessary to point out that the extant property is not the original building established within its grounds and its role has also altered, thus the relationship with its wider setting has also changed. There is some variable intervisibility with Huntslands from various points within the wider area; however only a few of these views allow its significance to be appreciated. It is important to note that intervisibility has also increased due to winter leaf fall; with current warmer climate conditions, leaf fall has altered and we would expect that any increased intervisibility due to leaf fall is now limited to the winter and early spring months only.

The wider rural setting of Huntslands is thus assessed as making a minor to moderate positive contribution only to its setting and significance. The role of the former farm buildings have altered and the farm buildings maintain extremely limited intervisibility with their wider rural setting; their wider setting is thus assessed as

LAND TO THE WEST OF THE A507 BETWEEN COTTERED AND CROMER, HERTFORDSHIRE, SG9 9PU

making a minor positive contribution only to their setting and significance as indicative of their former historical setting.

The Study Site comprises open fields contained by significant vegetation. Due to recent landscaping, there is intervisibility between the Site with Huntslands from Fields Four, Five and Six. It is important to note that intervisibility has also increased with the property due to winter leaf fall; current warmer climate conditions have altered leaf fall and we would expect that increased intervisibility due to leaf fall would now be limited to the winter and early spring months only. From Fields Four and Six, there are some glimpsed views of the property and grounds and it is possible to partially appreciate its significance. From Field Five, it is possible to appreciate the significance of Huntslands more fully. In respect of the former farm buildings there is extremely limited intervisibility between them with the Site and it is not possible to appreciate or understand their significance. The Site is considered to make a minor positive contribution only to their significance as forming part of their historical setting.

Conclusions reached by the Council and response

The settings and significance of the Grade II listed Westlands and Lemon Meadow Yew Tree Cottage are stated by the council as being caused less than substantial harm, at the low or low-mid level of that range and the non-designated built heritage grouping at Huntsland at the mid level of harm to an NDHA grouping of a mid-level of interest within the local context.

Westlands

There is good intervisibility with the front elevation of Westlands from Turners Hill Road and variable intervisibility of the property from the public footpath located to its south; its intrinsic architectural and historic interest and significance can be appreciated from these public viewpoints.

We disagree that the open and rural character of the land to the west of Westlands contributes positively to the manner in which its special interest as a rural 16th century dwelling is currently appreciated. Although historically the Site formed part of the property's wider rural setting – this has significantly altered due to the part clearance of Prescotts Wood and the construction of the modern Hurst Farm Complex (now disused). The Worth Tithe map of 1843 also evidences that the property and its immediately adjacent land were in different ownership than the Site.

The Site is currently screened from the property by thick, intervening vegetation and there are no direct views between the Site and Westlands. It is only possible to experience the significance of this built heritage asset from Turners Hill Road and from the public footpath that runs to its west; there is no experience of its significance from the Site. The surviving rural setting to the west of Westlands is considered to make a minor positive contribution only to its significance as indicative of its former historical setting.

We disagree that the Site contributes positively to the rural character of the wider approach to Westlands from the south west along the public footpath, running to its west. There is thick vegetation to the west of the public footpath and the limited intervisibility that exists only allows some minor glimpsed views of the now closed Hurst Farm development. The significance of Westlands would not be diminished due to the proposed development.

It is assessed that there would be less than substantial harm at the low level of that range to Westlands due to the proposed development.

Lemon Meadow Yew Tree Cottage

The significance of this built heritage asset would be appreciable from its immediate setting. Lemon Meadow Yew Tree Cottage is not visible or appreciable from the public highway and the extremely limited intervisibility it maintains from the public footpath at Worth Way does not allow its significance as a Grade II listed building to be appreciated.

LAND TO THE WEST OF THE A507 BETWEEN COTTERED AND CROMER, HERTFORDSHIRE, SG9 9PU

We disagree that the surviving rural setting of Lemon Meadow Yew Tree Cottage is considered to make a strong positive contribution to its special interest and how it is appreciated. Although historically considered as forming part of the listed building's setting, it has been physically separated from the Site since at least 1874, due to the construction of the railway line and embankment. The property is accessed by a private driveway and is scarcely appreciable from the wider environment. It is difficult to appreciate any significance of the building from the footpath along the Worth Way due to thick intervening vegetation to east (even in winter) and due to the thick intervening vegetation to west of the Worth Way, it is difficult to consider any contribution that the Site could make to the significance of this listed building.

The property is appreciable within its private setting; there is no experience of its significance from the Site due to the intervening railway embankment and thick vegetation. The surviving rural setting to the west of this built heritage asset is not considered to contribute to its special interest or how it is appreciated. There may be some increase in noise and light pollution due to the proposed development; however this is considered to be limited due to the location of the property and that it is well enclosed within its own immediate setting's thick vegetation and that it is naturally buffered from the Site by vegetation running along the Worth Way and the Site's southern boundary line. The thick vegetation to the south of the Site would be maintained and bolstered (to the southern boundaries of Fields Six and Seven).

It is assessed that there would be less than substantial harm at the very low level of that range to Lemon Meadow Yew Tree Cottage due to the proposed development.

Huntslands

The immediate setting of Huntslands is assessed as making a strong positive contribution to its significance due to it appearing to be reminiscent of how the grounds were formerly laid out with the expansive, attractive and undulating landscaping leading down to a small pond and jetty. In respect of the wider setting of Huntslands, it is necessary to point out that the extant property is not the original building established within its grounds and its role has also altered, thus its relationship with the surrounding wider setting has also changed. It is also necessary to point out that the 1874 Ordnance Survey map evidences that there were a significant number of trees planted to the south of the property so that it would not have readily maintained any intervisibility with its wider setting beyond its southern boundary line. The immediate setting of the farm buildings appears to have been somewhat altered and is laid out in the style of 'contemporary' gardens; as such their immediate setting is assessed as making a minor positive contribution only to their significance as indicative of their historical setting.

There is some variable intervisibility with Huntslands from various points within the wider area; however only a few of these views allow its significance to be appreciated. Its wider rural setting has been assessed as making a minor to moderate positive contribution to its setting and significance. The role of the former farm buildings has altered and the farm buildings maintain extremely limited intervisibility with their wider rural setting; this wider setting is thus assessed as making a minor positive contribution only to their setting and significance as indicative of their former historical setting.

Due to recent significant landscaping by the current proprietors of Huntslands, there is increased intervisibility between the Site with Huntslands from Fields Four, Five and Six. It is important to note that intervisibility has also increased with the property due to winter leaf fall; current warmer climate conditions have altered leaf fall and we would expect that increased intervisibility due to leaf fall would now be limited to the winter and early spring months only. From fields Four and Six, there are some glimpsed views of the property and grounds and it is possible to partially appreciate its significance. From Field Five, it is possible to appreciate the significance of Huntslands more fully. In respect of the former farm buildings there is extremely limited intervisibility between them with the Site with and it is not possible to appreciate or understand their significance. The Site is considered to make a minor positive contribution only to their significance as forming part of their historical setting.

Historically, the surviving rural setting located around Huntsland and the former farmstead would have made a strong positive contribution to their significance; however, the function of Huntsland has altered, now being

LAND TO THE WEST OF THE A507 BETWEEN COTTERED AND CROMER, HERTFORDSHIRE, SG9 9PU

a hotel and wedding venue, as has the function of the former farmstead buildings. Overall, it is considered that the surrounding rural setting makes a minor positive contribution only to their significance as indicative of their former landscape settings.

We disagree that in respect of the northern site, development will affect the currently rural views looking northwards from the public footpath in respect of the grouping at Huntslands. Walking along this footpath we do not consider that this group is experienced within this context, but rather within the context of the southern element of the Site.

We disagree that the proposed development will have a fundamental impact on the context of the grouping looking north and east from local public footpaths. In respect of the former farm buildings, intervisibility is extremely limited and it is not possible to appreciate their significance as a group with Huntslands from public footpaths. In respect of Huntslands, although there are some glimpsed views of the property from three separate locations along the Worth Way, it is not possible to appreciate its significance due to distance and obstructed views due to significant interceding vegetation. The character and approach to the grouping along the public footpath running along the line of the entrance driveway would not be altered approaching from the east; approaching the grouping from the west, there would be some alteration to the wider setting of the grouping - however, Field three (most proximate to this public right of way) is proposed to remain undeveloped and interceding vegetation and development does extend along this stretch of the public footpath.

The rural character of the wider setting of Huntslands would be altered when looking southwards and eastwards from both within the property and its immediate setting. There would also be some increase in noise and light levels due to the proposals. It has already been stated that the extant property is not the original building established within its grounds and its role has also altered, thus its relationship with the surrounding wider setting has also changed so that its wider rural setting has been assessed as making a minor to moderate positive contribution to its setting and significance. The role of the former farm buildings has altered and the farm buildings maintain extremely limited intervisibility with their wider rural setting; they were thus assessed as making a minor positive contribution only to their setting and significance as indicative of their former historical setting.

The level of harm to the non-designated Huntslands grouping is assessed as less than substantial at the minor to moderate level of that range. The significance of Huntslands would still be able to be appreciated and continue to contribute to the character and quality of life of the District. The level of harm assessed has been taken into consideration by the Applicant and increased buffering is proposed to the west of Field Five and to the north of Fields Four and Six. This increased vegetative screening would reduce the level of harm to Huntslands to a minor level within the range of less than substantial harm.

Conclusion

It is assessed that there would be less than substantial harm at the low level of that range to Westlands due to the proposed development.

It is assessed that there would be less than substantial harm at the very low level of that range to Lemon Meadow Yew Tree Cottage due to the proposed development.

The level of harm to the non-designated Huntslands grouping was assessed as less than substantial at the minor to moderate level of that range. The level of harm to Huntslands assessed has been taken into consideration by the Applicant and increased buffering is proposed to the west of Field Five and to the north of Fields Four and Six. This increased vegetative screening would reduce the level of harm to Huntslands to a minor level within the range of less than substantial harm. (Please find the Landscape Masterplan attached for reference).

The levels of harm assessed in this letter would be weighed against the public benefits of the proposals as per NPPF Paragraph 215.

LAND TO THE WEST OF THE A507 BETWEEN COTTERED AND CROMER, HERTFORDSHIRE, SG9 9PU

Built Heritage has been taken into consideration in respect of built heritage assets in vicinity to the Site and accords with the provisions of Section 66(1) of the 1990 Planning (Listed Buildings and Conservation Areas) Act, the NPPF and Local Plan Policy DP34.

RPS Consulting Services Ltd.
20 Farringdon Street
London
EC4A 4AB
T +44 20 3691 0500