Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead West Sussex

Reserved Matters - Built Heritage Statement

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REPORT

	Authored by	Reviewed by	Approved by	Review date
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Final Seth Price				16/12/2025

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Prepared by:

Tetra Tech Consulting Limited

Elizabeth Da Silva BA (Hons) MSc

Click or tap here to enter text.

20 Farringdon Street
London
EC4A 4AB

Prepared for:

Vistry Group

John Longhorn

11 Tower View
Kings Hill
West Malling
Kent
ME19 4UY

Executive summary

- This Built Heritage Reserved Matters Statement supports a Reserved Matters application for Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead, West Sussex.

- The application was granted planning permission in November 2025 (DM/23/2699) for a hybrid planning application. There are no specific conditions relating to built heritage, however, Condition 18 states that Mid Sussex District Council require that details of the siting, design, appearance and landscaping of the Site (the 'reserved matters') be obtained from the Local Planning Authority prior to the commencement of development of any relevant phase and that the development for that phase shall be carried out as approved.
- This Statement is intended to demonstrate how the design details - siting, appearance and landscaping of the Site have been informed by the relevant built heritage assets that were outlined in the Recommendation for Approval Notice.
- The Recommendation for Approval identified four built heritage assets to be taken into consideration:
    - Gullege, Grade II* (NHLE:1248946)
    - 1-3 Imberhorne Farm Cottages, Grade II* (NHLE:1392066)
    - Imberhorne Farmhouse, Grade II (NHLE:1277678).

    and

    - The curtilage listed farm buildings at Imberhorne Farm
- Mid Sussex's Conservation Officer, Historic England and the applicant all identified that the outline development would cause 'less than substantial harm' to the significance of the built heritage assets, with the degree of harm identified as varying. That harm was considered to be outweighed by the public benefits of the scheme.
- This Built Heritage Reserved Matters Statement has examined the various mitigation measures proposed in respect of the relevant built heritage assets, that is siting of development, design, appearance and landscaping of the Site, based on the Masterplan. It is concluded that the proposed mitigation measures go a significant way towards reducing the impact of the proposed development, though that some harm to each of the identified heritage assets would remain. Any such harm would fall within the lower end of the spectrum of less than substantial harm.
- Legislation and National Planning Policy and Guidance has been adhered to by affording the built heritage assets 'great weight', thus giving them due regard. Local Planning Policy SA20 of the SADPD is also adhered to.

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1 Introduction

1.1 This Built Heritage Statement has been researched and prepared by Tetra Tech Consulting Limited, on behalf of the Vistry Group, in order to support a Reserved Matters application for Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead, West Sussex. The Statement is intended to demonstrate how the design details - siting, appearance and landscaping of the Site have been informed by the relevant built heritage assets: Gullege, Grade II* (NHLE:1248946), 1-3 Imberhorne Farm Cottages, Grade II* (1392066) and Imberhorne Farmhouse, Grade II (1277678). Imberhorne Farm Courtyard comprises a group of former fam buildings located to the north of the Farm Cottages and west of the former Farmhouse – these are regarded as curtilage listed by Mid Sussex District Council.

1.2 The Site was allocated for development in the Mid Sussex Council Site Allocations Development Plan Document (SADPD) (June 2022). The application was granted planning permission in November 2025 (DM/23/2699) for a '*hybrid planning application seeking 1) outline planning permission for a mixed use development comprising up to 550 dwellings (Use Class C3), a care village of up to 150 dwellings (Use Class 2), land for a 2 form entry primary school (including early years provision and special needs education provision), mixed use neighbourhood centre, allotments, landscaping and sustainable urban drainage; and 2) full planning permission for playing fields, new sports pavilion, and running track associated with Imberhorne Secondary School, a Suitable Alternative Natural Greenspace (SANG) with associated car park, access from Imberhorne Lane, internal road to the SANG, pedestrian/cycle link from Imberhorne Lane and associated landscaping and infrastructure. (Additional/amended information and plans received 22nd May 2024).*'

1.3 There are no specific conditions relating to built heritage, however general Condition 18 (*'Approval of the details of the siting, design, appearance and landscaping of the site (hereinafter called the "reserved matters") shall be obtained from the Local Planning Authority, prior to the commencement of development of any relevant phase, and the development, for that phase, shall be carried out as approved. Application for approval of the reserved matters shall be made to the Local Planning Authority before the expiration of 3 years from the date of this permission)* are relevant for the purposes of this Statement.

1.4 Under Site Specific Policy SA20 of the SADPD it states: "*Protect the rural setting of the nearby Grade II* listed Gullege, Grade II listed Imberhorne Farm and Grade II* listed Imberhorne Cottages by masterplanning the layout, design and landscape structure to ensure the development is not dominant in views from these listed buildings*".

1.5 Mid Sussex District Council's Conservation Officer, Historic England and the applicant all identify that the proposal would cause 'less than substantial harm' to the significance of the built heritage assets, with the degree of harm identified as varying. This harm was considered to be outweighed by the public benefits of the scheme.

1.6 The findings of this Report are based on known conditions at the time of writing and are the result of detailed historic research, a visit to the Site and the application of professional judgment. All maps, plans and photographs are for illustrative purposes only. Orion's Heritage Statement (September 2023) formed part of the application documents. In order to avoid unnecessary repetition, this document will not reproduce previous data concerning the historical development of and associated historical mapping associated with the Site.

2 Legislative and Planning Policy Framework

2.1 The current national legislative and planning policy system identifies, through the National Planning Policy Framework (NPPF), that applicants should consider the potential impact of development upon 'heritage assets'. This term includes: designated heritage assets which possess a statutory designation (for example listed buildings and conservation areas); and non-designated heritage assets, typically identified by Local Planning Authorities (LPAs) and incorporated into a Local List and/or recorded on the Historic Environment Record.

Legislation

2.2 Where any development may affect certain designated heritage assets, there is a legislative framework to ensure proposed works are developed and considered with due regard to their impact on designated heritage assets. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990.The relevant legislation in this case extends from section 66 (1) of the 1990 Act which states that special regard must be given by the decision maker, in the exercise of planning functions, to the desirability of preserving or enhancing listed buildings and their setting.

2.3 The meaning and effect of these duties have been considered by the courts, including the Court of Appeal's decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137. The Court agreed within the High Court's judgement that Parliament's intention in enacting section 66(1) was that decision makers should give '*considerable importance and weight*' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.

National Planning Policy

National Planning Policy Framework (Ministry of Housing, Communities and Local Government December 2024, as amended February 2025)

2.4 The NPPF is the principal document that sets out the Government's planning policies for England and how these are expected to be applied.

2.5 It defines a heritage asset as 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'. This includes both designated and non-designated heritage assets.

2.6 The NPPF defines significance for heritage policy as 'The value of a heritage asset to this and future generations because of its heritage interest'.

2.7 Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are '*an irreplaceable resource and should be conserved in a manner appropriate to their significance*'.

2.8 For proposals that have the potential to affect the significance of a heritage asset, paragraph 207 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their setting. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 208, which requires LPAs to take this assessment into account when considering applications.

2.9 Under 'Considering potential impacts' paragraph 212 states that 'great weight' should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.

2.10 Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, paragraph 214 states that local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. The NPPF does not define substantial harm with this being the judgment of the decision taker.

2.11 Paragraph 215 states that 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.

National Guidance

Planning Practice Guidance (DCLG)

2.12 The Planning Practice Guidance (PPG) has been adopted to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.

2.13 The PPG defines the different heritage interests as follows:

- archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

2.14 Key elements of the guidance relate to assessing harm. It states that substantial harm is a high bar that may not arise in many cases. It also states that that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset's special interest. It is the degree of harm, rather than the scale of development, that is to be assessed.

Overview: Historic Environment Good Practice Advice in Planning

2.15 Historic England have published a series of documents to advise applicants, owners, decision-takers and other stakeholders on managing change within the historic environment. These include Historic Environment Good Practice Advice in Planning (GPAs) documents and Historic England Advice Notes (HEANS).

GPA1: The Historic Environment in Local Plans (March 2015)

2.16 This advice note focuses on the importance of identifying heritage policies within Local Plans. The advice echoes the NPPF by stressing the importance of formulating Local Plans based on up-to-date and relevant evidence on economic, social and environmental characteristics and prospects of the area, including the historic environment.

GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

2.17 This document provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
6. Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

GPA3: The Setting of Heritage Assets (Second Edition; December 2017)

2.18 This advice note focuses on the management of change within the setting of heritage assets. This document replaces GPA3: The Setting of Heritage Assets (March 2017) and Seeing History in the View (English Heritage, 2011) in order to aid practitioners with the implementation of national legislation, policies and guidance relating to the setting of heritage assets found in the 1990 Act, the NPPF and PPG. The guidance is largely a continuation of the philosophy and approach of the 2011 and 2015 documents and does not present a divergence in either the definition of setting or the way in which it should be assessed.

2.19 As with the NPPF the document defines setting as ‘the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve’. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset, or the ability to appreciate that significance. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.

2.20 While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, and thus the way in which an asset is experienced, setting also encompasses other environmental factors including

noise, vibration and odour. Historical and cultural associations may also form part of the asset's setting, which can inform or enhance the significance of a heritage asset.

2.21 This document provides guidance on practical and proportionate decision making with regards to the management of change within the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a heritage asset may have positive or neutral effects.

2.21 The document also states that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting, and that different heritage assets may have different abilities to accommodate change without harming their significance. Setting should, therefore, be assessed on a case-by-case basis.

2.22 Historic England recommends using a series of detailed steps in order to assess the potential effects of a proposed development on significance of a heritage asset. The 5-step process is as follows:

Identify which heritage assets and their settings are affected;

1. Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
2. Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
3. Explore ways to maximise enhancement and avoid or minimise harm; and
4. Make and document the decision and monitor outcomes.

HEAN12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (October 2019)

2.23 This advice note provides information on how to assess the significance of a heritage asset. It also explores how this should be used as part of a staged approach to decision-making in which assessing significance precedes designing the proposal(s).

2.24 Historic England notes that the first stage in identifying the significance of a heritage asset is by understanding its form and history. This includes the historical development, an analysis of its surviving fabric and an analysis of the setting, including the contribution setting makes to the significance of a heritage asset.

2.25 To assess the significance of the heritage asset, Historic England advise to describe various interests. These follow the heritage interest identified in the NPPF and PPG and are: archaeological interest, architectural interest, artistic interest and historic interest.

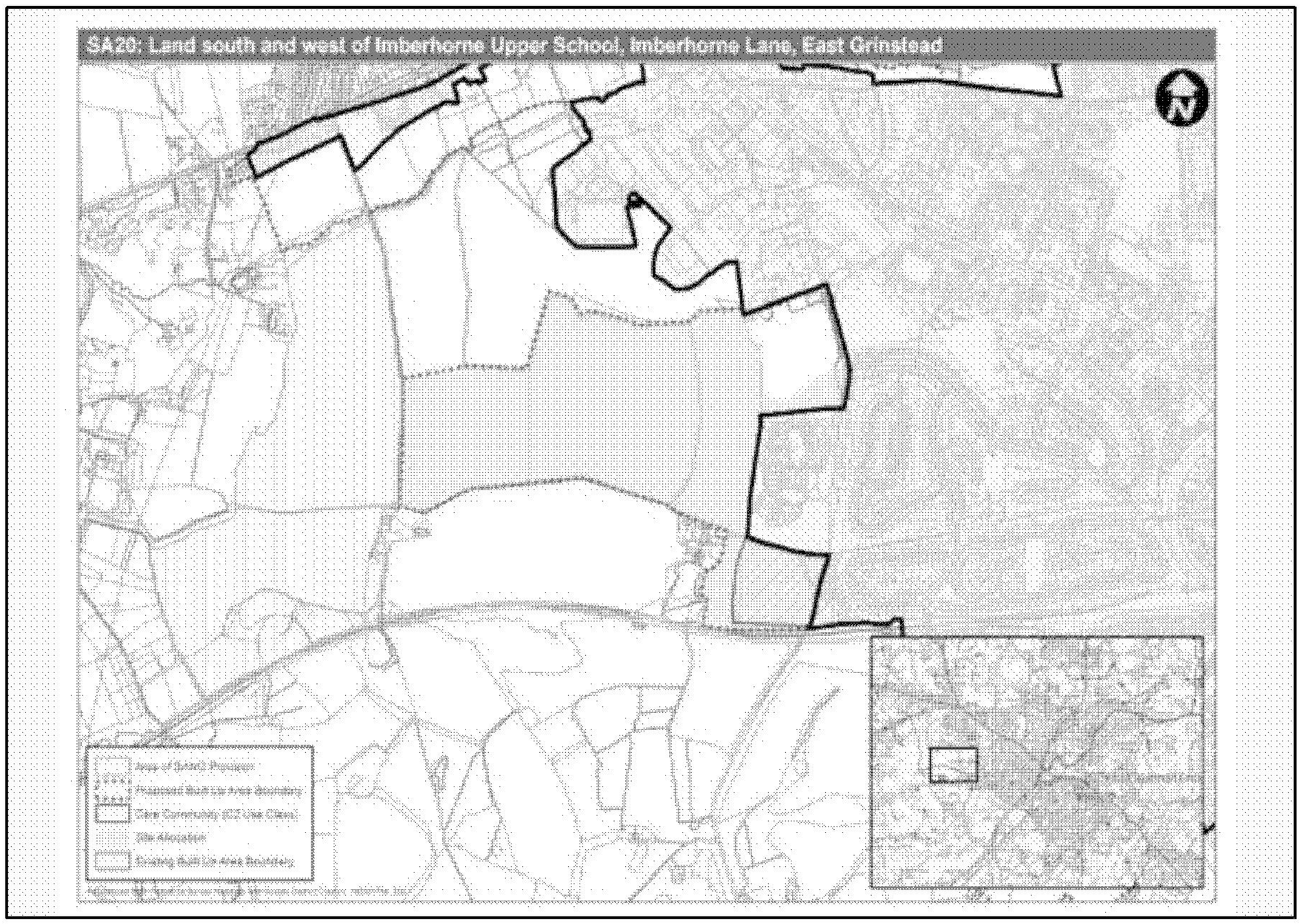
Local Planning Policy

2.26 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.

2.27 The local planning authority for the Site is Mid Sussex District Council and development on the Site is subject to compliance with their Local Development Documents. The following edited policies are relevant to the Proposed Development:

2.28 The Site has been allocated in the Mid Sussex Council Site Allocations Development Plan Document (SADPD) (June 2022) for a major development (550 dwellings).

SA 20 Land south and west of Imberhorne Upper School, Imberhorne Lane, East Grinstead			
SHELAA:	770	Settlement:	East Grinstead
Gross Site Area (ha):	64.8	Number of Units:	550 dwellings
Description:	Housing allocation with Local Centre and Care Community (C2), early years, primary school and facilities for Special Educational Needs (2FE), strategic SANG, public open space and children's equipped playspace, provision of land for playing fields associated with Imberhorne School.		
Ownership:	Private land owner		
Current Use:	Greenfield/arable/ pasture	Indicative Phasing:	1 to 5
Delivery Mechanisms:	In control of a land promoter		



Figures 1 and 2: SA20 allocation as outlined in the SADPD

2.29 In respect of the historic built environment, Site Specific Policy SA20 of the SADPD states the following:

- Protect the rural setting of the nearby Grade II* listed Gullege, Grade II listed Imberhorne Farm and Grade II* listed Imberhorne Cottages by masterplanning the layout, design and landscape structure to ensure the development is not dominant in views from these listed buildings.

Mid Sussex District Plan (2014 – 2031) (adopted March 2018)

DP34: Listed Buildings and Other Heritage Assets Strategic

Objectives:

2.30 2) To promote well located and designed development that reflects the District's distinctive towns and villages, retains their separate identity and character and prevents coalescence; 4) To protect valued characteristics of the built environment for their historical and visual qualities; and 11) To support and enhance the attractiveness of Mid Sussex as a visitor destination. Evidence Base: West Sussex Historic Environment Record; Register of Listed Buildings.

Listed Buildings:

2.31 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;

• Special regard is given to protecting the setting of a listed building.

2.32 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. Significance can be defined as the special interest of a heritage asset, which may be archaeological, architectural, artistic or historic. Proposals affecting such heritage assets will be considered in accordance with the policies in the National Planning Policy Framework (NPPF) and current Government guidance.

Mid Sussex Site Allocations Development Plan Document (adopted June 2022)

Historic Environment and Cultural Heritage

2.33 Respect listed buildings, conservation areas, scheduled monuments, the historic landscape, registered parks and gardens and their settings and look for opportunities to enhance or better reveal their significance. All heritage assets, including those that are undesignated, will need to be conserved and enhanced.

2.34 Provide Heritage Impact Assessments, where appropriate, to establish the significance of heritage assets and their settings, the impact of development on this significance and, if appropriate, mitigation strategies in accordance with District Plan policies DP34: Listed Buildings and other Heritage assets.

Mid Sussex District Plan (2021 – 2039) Submission Draft Regulation 19

2.35 The District Council is reviewing and updating the District Plan that will, upon adoption, replace the current District Plan 2014-2031 so that its policies will have full weight. The draft District Plan 2021-2039 (Regulation 19) is currently at Examination; stage 1 hearings were concluded in October 2024. Due to there being unresolved objections to the majority of Policies in the draft District Plan only

minimal weight can be given to the Plan. The planning application for Land South and West of Imberhorne Upper School, Imberhorne Lane has been assessed against the polices of the adopted District Plan.

East Grinstead Neighbourhood Plan (Made November 2016)

Policy EG4 Designated and Non-Designated Heritage Assets

2.36 Applications affecting designated and non-designated heritage assets must be supported by an appropriately detailed assessment of their heritage significance and the impact of the proposals on that significance.

Mid Sussex Design Guide Supplementary Planning Document (SPD) (November 2020)

2.37 The aim of the 'Mid Sussex Design Guide' SPD is to help deliver high quality development across the district that duly responds to its context and is inclusive and sustainable. The SPD is a material consideration in the determination of planning applications.

3 Site Overview

3.1 The Site is located at approximately 1.9 kilometres to the north-west of East Grinstead, an historic market town situated to the northeast corner of West Sussex. It is proximate to the East Sussex, Kent and Surrey borders and lies at approximately 41 kilometres to the south of London.

3.2 It covers an area of circa 83.5 hectares distributed over various parcels of generally arable land. The Site is located to the north of Bridleway 44b/EG/1 that runs east west from Imberhorne Lane, connecting the Worth Way to Hophurst Hill. The Site also includes an undeveloped field located south-east of the main Site and south of the Bridleway, immediately to the west of Imberhorne Lane.

3.3 To the north, the Site is bounded by Ancient Woodland, beyond which lies the Birches Industrial Estate. Just beyond the Site's north-eastern boundary line sits Imberhorne School whose playing field partly falls into the application boundary red line (its southernmost portion). To the south the Site is bounded by Bridleway 44b/EG/1, whilst to the east, it is bounded by The Oaks residential development from which it is separated by a line of mature trees. To the west, the Site is bounded by Bridleway 40aEG.

3.4 Site photos are located on pages 23 to 27 (Plates 1 to 12).

4 Built Heritage Assets

4.1 Mid Sussex Council's Conservation Officer and Historic England have identified that the proposal would cause 'less than substantial harm' to the significance of the following built heritage assets, with the degree of harm identified as varying. This harm was considered to be outweighed by the public benefits of the scheme.

- Gullege, Grade II* (NHLE:1248946)
- 1-3 Imberhorne Farm Cottages, Grade II* (NHLE:1392066)
- Imberhorne Farmhouse, Grade II (NHLE:1277678).
- Imberhorne Farm Courtyard (curtilage listed in association with Imberhorne Farmhouse)

5 Assessment of Built Heritage Assets

Gullege – Grade II* (NHLE:1248946)

5.1 Gullege is located at circa 1.10 kilometres to the west of Imberhorne Lane and south of Bridleway 44b/EG/1 that runs to the south of the Site. The property sits in very close proximity to the south of the Site at circa 100 metres at its closest point. Set within private, expansive grounds that maintain open views of the agricultural land to its south, the property is hidden from the Site due to thick tree cover to its north and east. To the west of Gullege are various former farm related buildings that are associated with the property.

5.2 The Historic England listing states that this building is an "*Excellent example of small manor house early C17 once belonging to Allfrey family. Chief front to south, built of stone, with stone dormers, mullions, gables, finials, strings etc. Local stone. East front timber framed. West front timber framed but covered with tiling. North front, roof sweeping down to within 5 feet of ground. Two magnificent stacks*".

5.3 The wider setting of Gullege comprises a combination of agricultural land and woodland so that the house is experienced as within a rural setting. Due to its historical usage the former manor house would probably have had a functional relationship with elements of the surrounding farmland that is still in agricultural usage. There are some important views of the property towards the principle south façade looking north from the Worth Way. The property does not maintain views with the Site.

Significance

5.4 The heritage significance of Gullege lies first and foremost in the architectural and historical special interest of its fabric and form. The house provides a very good example of a rural Sussex manor/farmhouse dating to the early seventeenth century and illustrates the architectural craftmanship of the period and region. The use of vernacular materials is also of aesthetic value. The associated buildings located to the west of the house, including a former barn, that previously formed part of a farm courtyard – these have group value with the house; collectively they form an agricultural set piece, with each element contributing to an understanding of the significance and former function of the whole (albeit curtailed by changes in use/alterations).

Contribution of Setting to Significance

5.5 Both the immediate and wider settings of Gullege are considered to make a strong positive contribution to the significance of the house. Its immediate setting due to the associative barns and other related structures and its private gardens, that provide an appropriate setting for a previous small manor house. Its wider setting due to the contribution of the remaining rural land that positively affects the character of the property, providing views of Gullege from numerous viewpoints (to the south of the house and in different approaches to Gullege, for example when walking along the proximate Bridleway or PRoW). The surrounding rural land to the south also allows clear views from the property over its historical landscape setting.

Contribution of Site to Significance

5.6 Due to its historical usage Gullege would probably have had a functional relationship with elements of the surrounding farmland, including the Site. Additionally, the Site provides the backdrop to the listed building in respect of the important views of the property towards its principle south façade looking north from the Worth Way. Overall, the Site is assessed as making a strong positive contribution to the setting and significance of Gullege.

1-3 Imberhorne Farm Cottages – Grade II* (NHLE: 1392066)

5.7 1-3 Imberhorne Cottages are located at circa 300 metres to the west of Imberhorne Lane and are in close proximity to Bridleway 44b/EG/1, that runs to the south of the Site. The east elevation of one of the cottages is set immediately adjacent to a small internal access route that leads off Bridleway 44b/EG/. Otherwise, the front elevations of the buildings face west towards a small group of houses, whilst the east elevation looks over a private garden and the north elevation faces onto low level buildings surrounding a courtyard. Their wider setting consists of a combination of agricultural land, woodland and residential development both in proximity to Imberhorne Lane and at the new Barcombe Place development. The Site includes an undeveloped field located in close proximity to the cottages, to their east.

5.8 The Historic England listing states that these cottages are "*Former open hall, later three cottages. Nos. 2 and 3 comprised an early C15 open hall aligned east-west, timbers in No. 3 tree-ring dated to 1428. In the late C16 the open hall was veiled over and a chimneystack inserted. No. 3 is a late C18 or early C19 L-shaped wing addition to the north. Nos. 2 and 3 timber-framed, the ground floor underbuilt in brickwork on deep stone plinth, except to the west. The upper floor and gable end are tile-hung. Gabled roof of C20 machine-made tiles and central brick chimneystack, rebuilt above ridge level after 1926*".

Significance

5.9 The significance of the cottages is foremost vested in their built fabric, including timber framing dated to the early 15th century and its arch-braced hammerbeam roof; a very close copy of Harland's design for Westminster's Great Hall and the only known surviving example of usage within a vernacular building. The cottages are also of significance as a result of their association with the important Sackville family, the Dukes of Dorset, until 1872 and as they have group value with the associated Imberhorne Farm and former farm buildings grouped around the farm courtyard.

Contribution of Setting to Significance

5.10 The contribution that their setting makes to their significance is positive due to the cottages forming a functional part of the nineteenth century farmstead comprising Imberhorne Farm, the cottages and the farm courtyard. The surrounding land is still in agricultural usage. Their setting is particularly

noticeable as one approaches the cottages via the Bridleway and internal access road and the appreciation of the cottages is also obtained in various views from the Worth Way and Imberhorne Lane.

Contribution of Site to Significance

5.11 The Site makes a positive contribution to the significance of the cottages by providing an open, rural backdrop to these properties. The cottages would also probably have had a functional relationship with the Site, in part, due to their group value with Imberhorne Farmhouse and the former farm buildings grouped around the courtyard.

Imberhorne Farmhouse – Grade II (NHLE: 1277678)

5.12 The farmhouse is located immediately to the south of Bridleway 44b/EG/1 off Imberhorne Lane. It is generally well screened from the Bridleway and the surrounding area to north and east due to thick tree screening; however, this may alter due to seasonal leaf fall. The wider setting of Imberhorne Farmhouse consists of a combination of agricultural land, woodland and residential development both in proximity to Imberhorne Lane and at the new Barcombe Place development. There is some intervisibility of the farmhouse from the internal access way and in other views to south and west of the building (from the Worth Way) and form Imberhorne Lane. The Site includes an undeveloped field that is located immediately to the east of the property.

5.13 The Historic England listing states that this building is a "*Good example of well-built farmhouse of 1820. 3 storeys 3 bays. The central bay projecting slightly and carrying a modified form of pediment. Sash windows, with 4 divisions vertically. Walls: brick. Roof: heavy stone slates. Front door with low, wide segmental fanlight*."

Significance

5.14 The heritage significance of Imberhorne Farmhouse is foremost derived from its architectural and historical values as a sound example of an early-nineteenth-century Sussex farmhouse of fairly high status with design and craftmanship interest. It also has group value with 1-3 Imberhorne Farm Cottages and the group of former farm buildings located around the farm courtyard.

Setting and Contribution of Setting to Significance

5.15 Due to its previous function and association, the extant rural setting of the farmhouse makes a strong positive contribution to its significance with the surrounding land still in agricultural usage. Views to and from Imberhorne Farmhouse, including from the Worth Way, enable an understanding of that significance, allowing the farmhouse to be experienced within its wider rural setting.

Contribution of Site to Significance

5.16 Due to its historical usage Imberhorne Farmhouse would probably have had a functional relationship with elements of the surrounding farmland, including the Site. Additionally, the Site provides the backdrop and character of views to and from the listed building. Overall, the Site is assessed as making a strong positive contribution to the setting and significance of Imberhorne Farmhouse.

Imberhorne Farm Courtyard

5.17 The farm buildings are located around a courtyard to the west of Imberhorne Farmhouse and positioned immediately to the south of t Bridleway 44b/EG/1. They are generally well screened from the Bridleway and the surrounding area to north and east due to thick tree screening; however, this may alter due to seasonal leaf fall. The wider setting of these buildings consists of a combination of

agricultural land, woodland and residential development both in proximity to Imberhorne Lane and at the new Barcombe Place development. There is some intervisibility of these farm buildings from the internal access way and in other views to south and west of the building (from the Worth Way) and from Imberhorne Lane. The Site includes an undeveloped field that is located immediately to the east of the farm buildings.

5.18 These structures comprise a group of former nineteenth-century farm buildings located to the north of 1-3 Imberhorne Farm Cottages and west of the former Farmhouse. They are regarded by Mid Sussex District Council as curtilage listed.

Significance

5.19 The heritage significance of Imberhorne Farm Courtyard is derived from their architectural interest and historical values as examples of nineteenth century farm buildings with design and craftmanship interest. They provide a good example of a working farm courtyard of the early nineteenth century. They have group value with Imberhorne Farmhouse and 1-3 Imberhorne Farm Cottages.

Contribution of Setting to Significance

5.20 Due to their previous function and association, the extant rural setting of the farm buildings makes a strong positive contribution to their significance and contributes to the appreciation of the views to and from the buildings, including from the Worth Way.

Contribution of Site to Significance

5.21 Due to their historical usage the farm buildings would probably have had a functional relationship with elements of the surrounding farmland, including the Site. Additionally, the Site provides the backdrop and character of views to and from these structures. Overall, the Site is assessed as making a strong positive contribution to the setting and significance of the farm buildings.

6 Consented Proposals

6.1 Planning permission was granted by Mid Sussex District Council (DM/23/2699) in November 2025 for the following:

6.2 Outline planning permission for a mixed-use development comprising up to 550 dwellings (Use Class C3) for:

- A care village of up to 150 dwellings (Use Class 2)
- Land for a 2-form entry primary school (including early years provision and special needs education provision)
- A mixed-use neighbourhood centre
- Allotments
- Landscaping
- Sustainable urban drainage

6.3 Full planning permission for:

- Playing fields
- New sports pavilion
- Running track associated with Imberhorne Secondary School
- A Suitable Alternative Natural Greenspace (SANG) with associated car park
- Access from Imberhorne Lane
- Internal road to the SANG
- Pedestrian/cycle link from Imberhorne Lane
- Associated landscaping and infrastructure.

7 Impact Assessment

7.1 The following comments made by Mid Sussex Council's Conservation Officer are in relation to the consultation response for the Hybrid Planning Application.

Gullege – Grade II* (NHLE:1248946)

Mid Sussex Council Conservation Officer Comments

- The proposed residential development will remove and reverse the currently positive contribution which the site makes, through setting, to the special interest of the listed building and how this is appreciated, including views from Gullege and how it is appreciated in surrounding vistas.

- The proposed development will also result in a very significant increase in noise and activity in proximity to Gullege, which currently sits in a position of tranquil rural isolation. This will also have a significant adverse effect on the positive contribution which setting currently makes to the special interest of the listed building and the manner in which this is appreciated.

- In respect of the proposed SANG land, the change in the visual character and intensity of use of this currently agricultural land will also have some adverse impact on its current positive contribution to the setting and special interest of Gullege, including views from and to it, and the approaches to it along affected PROWs, in that it will no longer retain its historical agricultural character, but will appear more as a country park.

- Mitigatory measures are proposed in order to address these concerns that include the retention of a buffer between the PRoW/entrance track to Gullege and the proposed positioning of an orchard in the southwestern corner of the residential site. With these mitigation measures in place, the Conservation Officer concluded that the resulting harm to the setting of Gullege is a mid to high level of less than substantial harm.

Response

7.2 The Applicant proposes an area of public open space (POS) to the north/north-east Gullege in line with the outline application plans. The POS will provide some mitigation in terms of the impact of the proposed development on the setting and outlook of Gullege.

7.3 It will not only provide a verdant grassed space but also be planted with larger native trees and an understory of native shrub to create an improved natural visual barrier and semi-rural appearance. Species will be selected to tie into the existing context as well as create a long-lived landscape feature. The landscape proposals include hedgerow planting to the edge of the POS whilst surface materials within the POS will be self-binding gravel to tie into the exiting track. This approach is intended to maintain the setting of Gullege as far as possible.

7.4 The retention of green space will assist as a buffer to reduce noise and activity related to the consented scheme. The significant POS buffer proposed will allow Gullege to maintain and be appreciated as far as possible in its tranquil location. Although the extant rural setting of the listed building will be altered, it will still be possible to appreciate its special interest as within a semi-rural location. Gullege still retains open views across the open field to its east (where intervisibility with the building is possible from the Worth Way) and with the fields to west, rear, of the property.

7.5 Building heights closest to Gullege will be limited to 2-storeys in order to reduce the level of visual impact on the outlook from the property as compared to the introduction of higher built form in the vicinity of this built heritage asset.

7.6 The southern edge of the development adjacent to Bridleway 44b/EG/1 is propsed as a green edge in order for the user to appreciate as far as possible a 'natural' landscape approach to Gullege.

1-3 Imberhorne Farm Cottages – Grade II* (NHLE: 1392066)

Mid Sussex Council Conservation Officer Comments

- The proposal will have a marked impact on the wider rural setting to the north and east of the Cottages, for the reasons described in relation to Imberhorne Farmhouse.

- However, the Conservation Officer noted that the significance of this asset and the contribution of setting towards this is different to the other heritage assets given the relative importance of the internal fabric of the original hall house.

- It was assessed that the resulting harm to the setting of 1 – 3 Imberhorne Farm Cottages is in the low to mid-point of less than substantial harm.

Response

7.7 The Applicant proposes amenity grassland to the north of 1-3 Imberhorne Farm Cottages. The grassland will provide some mitigation in terms of the impact of the proposed development on the setting and outlook of the cottages.

7.8 The verdant grassed space will also be planted with larger native trees and native mixed shrub planting, to create a natural, semi-rural appearance. Species will be selected to tie into the existing context as well as create a long-lived landscape feature. The landscape proposals include hedgerow planting to the edge of the POS whilst surface materials within the POS will be self-binding gravel to tie into the exiting track. This approach is intended to maintain the setting of 1 -3 Imberhorne Farm Cottages as far as possible.

7.9 The retention of green space will assist as a buffer to reduce noise and activity related to the consented scheme. The amenity grassland buffer proposed will allow the cottages to maintain and be appreciated as far as possible in their semi-rural location. Although the extant rural setting of 1-3 Imberhorne Farm Cottages will be altered, it will still be possible to appreciate their special interest as within a semi-rural location. As stated by the Conservation Officer, the significance of this asset and the contribution of setting towards this is different to the other heritage assets given the relative importance of the internal fabric of the original hall house.

7.10 Building heights closest to the cottages will be limited to 2-storeys and the cottages will retain open views across extant proximate fields to east and west, with the field to east retaining a semi-rural character.

7.11 The southern edge of the development adjacent to Bridleway 44b/EG/1 is propsed as a green edge in order for the user to appreciate as far as possible a 'natural' landscape approach in proximity to the cottages.

Imberhorne Farmhouse and Farm Courtyard – Grade II (NHLE: 1277678)

Mid Sussex Council Conservation Officer Comments

- The proposals will fundamentally alter the currently open and rural character of the land involved and will remove and reverse the positive contribution which this part of the site currently makes through setting to the special interest of Imberhorne Farmhouse.

- This impact will not only be on views from and towards the farmstead, including views from adjacent PROWs and the entrance track to the farm, and views towards the farmstead from Imberhorne Lane which will be obstructed or severely intruded upon by the proposed care community, but also on the character of the various approaches towards it.

- There will also be a very significant impact on the currently relatively tranquil rurality of the setting of the farmstead, with a marked increase in noise and busyness. In this instance the increase in vehicle movements is likely to be particularly notable, given the proximity of the main access into the residential development to the north.

- The resulting harm to the setting of Imberhorne Farm is a mid to high level of less than substantial harm. In respect of the Farm Courtyard, the impacts of the proposed development are similar to those on Imberhorne Farmhouse.

Response

7.12 The Applicant proposes amenity grassland to the north of Imberhorne Farmhouse and Farm Courtyard. The grassland will provide some mitigation in terms of the impact of the proposed development on the setting and outlook of the farmhouse.

7.13 The verdant grassed space will also be planted with larger native trees and native mixed shrub planting, to create a natural, semi-rural appearance. Species will be selected to tie into the existing context as well as create a long-lived landscape feature. Surface materials within this space will be self-binding gravel to tie into the exiting track.

7.14 The southern edge of the development adjacent to Bridleway 44b/EG/1 is propsed as a green edge in order for the user to appreciate as far as possible a ‘natural’ landscape approach in proximity to Imberhorne Farmhouse and Farm Courtyard. This approach is intended to maintain the setting of Imberhorne Farmhouse and Farm Courtyard as far as possible.

7.15 The retention of green space will assist as a buffer to reduce noise and activity related to the consented scheme. The amenity grassland buffer proposed will allow the Farmhouse and farm courtyard to maintain and be appreciated as far as possible in their semi-rural location. Although the extant rural setting of Imberhorne Farmhouse and the Farm Courtyard will be altered, it will still be possible to appreciate its special interest as within a semi-rural location.

7.16 Appropriate surfacing materials will be utilised to the road of the block facing towards the amenity space and Imberhorne Farm and Farm Courtyard.

7.17 Building heights closest to the Farmhouse and Farm Courtyard will be limited to 2-storeys and the Farmhouse will retain open views from its upper storeys across extant proximate fields to east and west, with the field to east retaining a semi-rural character in order to avoid any visual intrusion to the setting of these built heritage assets.

Feedback from the Conservation Officer as forwarded by Steven King, Team Leader, Major Development (June 2025) in respect of the Pre-Application Reserved Matters Meeting

Mid Sussex Council Conservation Officer Comments

- The green spaces shown on the outline plan to the north of Gullege, and to the north and east of Imberhorne Farm, are retained. These will be important in providing a degree of mitigation in terms of the impact of the proposed development on the settings and outlook of the assets, however as these were shown on the outline plan this further masterplan does not materially alter the level of harm previously identified.

Response

7.18 Areas of verdant open space in these locations have been retained in line with the outline application plans. This will provide some mitigation in terms of the impact of the proposed development on the setting and outlook of Gullege and Imberhorne Farm.

7.19 In respect of Gullege, further mitigation will be in the form of planting with larger native trees and an understory of native shrub to create an improved natural visual barrier and semi-rural appearance. Species will be selected to tie into the existing context as well as create a long-lived landscape feature.

7.20 The retention of green space will assist as a buffer to reduce noise and activity related to the consented scheme. The significant POS buffer proposed will allow Gullege to maintain and be appreciated as far as possible in its tranquil location. Although the extant rural setting of the listed building will be altered, it will still be possible to appreciate its special interest as within a semi-rural location. Gullege still retains open views across the open field to its east (where intervisibility with the building is possible from the Worth Way) and with the fields to west, rear, of the property.

7.21 In respect of the extant open space to the east of Imberhorne Farm and Courtyard, landscaping and detailed mitigation here will form part of a separate Care Village RM application.

Mid Sussex Council Conservation Officer Comments

- It is noted that the building heights to the development closest to Gullege and to the north of Imberhorne Farm will be limited to 2 storeys. This is welcome in as much as it will reduce the level of visual impact on the outlook from the assets compared with the introduction of higher built form in these positions.

Response

7.22 It is confirmed that these will be 2-storey buildings in order to avoid visual intrusion into the setting of these built heritage assets.

Mid Sussex Council Conservation Officer Comments

- The masterplan shows a number of character areas with indicative building forms, materials and landscaping treatments. Whilst I would largely consider these matters the remit of the Council's Urban Design Officer, I would query why the southern edge of the development directly to the north of Imberhorne Farm is not treated as Green Edge, rather than as part the seemingly even more urban Eastern Quarter? The inclusion of extensive green boundary treatments, and the use of appropriate surfacing materials with a semi-rural character to the road access, to the edge of the block facing towards the farmstead could perhaps be one

more small step towards mitigating the impact on the immediate context of these heritage assets.

Response

7.23 This area will be returned to 'green edge'. The landscape proposals include hedgerow planting to the edge of the POS. Surface materials within the POS will be self-binding gravel to tie into the exiting track. Appropriate surfacing materials will be utilised to the road of the block facing towards Imberhorne Farm and cottages.

Mid Sussex Council Conservation Officer Comments

- The landscape strategy is further developed as part of the pre-application submission. As above, the green spaces adjacent to the heritage assets are retained as per the outline plan. With respect to the soft landscaping within these spaces including the proposed orchard, amenity grassland, etc, it would be interesting to know what the ongoing management strategy for these spaces would be? Fruit trees, for example, are not I believe always particularly long lived. How will the applicant ensure that these spaces are appropriately maintained for the lifetime of the development? This will be crucial to ensuring that the mitigation they provide has longevity. The use of native and/or locally appropriate species within these areas will also be important to ensuring that they retain a natural, semi-rural appearance which will maximise the mitigation they provide.

Response

7.24 The orchard has been replaced with larger native trees in the latest set of proposals, with an area of native mixed shrub planting, to create a natural, semi-rural appearance. Species will be selected to tie into the existing context as well as create a long-lived landscape feature.

Mid Sussex Council Conservation Officer Comments

- I would be interested to know what the feature shown below (at low resolution) within the open space to the north of Imberhorne Farm, at its southeastern corner is? The treatment of this space and of the 2 adjacent parts of the access road, which runs very close to the assets in this location, should be carefully considered. Built form, or other visual clutter, should be avoided within this area, and wherever possible a semi-rural character retained.

Response

7.25 The feature shown is a sub-station - this will be moved to the opposite side of the main access road, to minimise visual intrusion to the heritage assets and landscape.

Comment

- In summary, the further evolution of the scheme as described in the pre-application documents raises a number of queries in terms of the detail of the treatment of the soft landscaped areas adjacent to the heritage assets, and the adjacent development, but as the proposal largely follows that seen at the outline application stage, the harm caused, through impact on setting, to the special interests of the affected assets would be anticipated to be broadly the same as that previously set out in relation to the outline application.

Response

7.26 The scheme has evolved since the pre-application documents. Areas of verdant open space have not only been retained in line with the outline application plans but, in respect of Gullege, further mitigation will be formed by planting with larger native trees and an understory of native shrub to create an improved natural visual barrier and semi-rural appearance. Species will be selected to tie into the existing context as well as create a long-lived landscape feature.

7.27 The retention of green space will assist as a buffer to reduce noise and activity related to the consented scheme. The significant POS buffer proposed will allow Gullege to maintain and be appreciated as far as possible in its tranquil location. Although the extant rural setting of the listed building will be altered, it will still be possible to appreciate its special interest as within a semi-rural location. Gullege will still retain open views across the open field to its east (where intervisibility with the building is possible from the Worth Way) and with the fields to west, rear, of the property.

7.28 The landscape strategy has been further developed with the previously proposed orchard replaced with larger native trees, with an area of native mixed shrub planting, to create a natural, semi-rural appearance. Species will be selected to tie into the existing context as well as create a long-lived landscape feature.

7.29 The southern edge of the development directly to the north of Imberhorne Farm will be returned to 'green edge'. The landscape proposals include hedgerow planting to the edge of the POS. Surface materials within the POS will be self-binding gravel to tie into the exiting track. Appropriate surfacing materials will be utilised to the road of the block facing towards Imberhorne Farm and cottages.

7.30 In respect of the extant open space to the east of Imberhorne Farm and Courtyard, landscaping and detailed mitigation here will form part of a separate Care Village RM application.

7.31 The proposals will reduce, though not remove in full, the harms identified as part of the outline planning application. Any such harms must now fall within the lower end of the spectrum of less than substantial harm; the greater part of the significance of each listed building, as vested in their built forms and immediate setting, would be preserved.

8 Conclusion

8.1 This Built Heritage Statement supports a Reserved Matters application for Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead, West Sussex. The Statement has demonstrated how the reserved matters have been informed by the relevant built heritage assets:

- Gullege, Grade II* (NHLE:1248946)
- 1-3 Imberhorne Farm Cottages, Grade II* (NHLE:1392066)
- Imberhorne Farmhouse, Grade II (NHLE:1277678) and
- Imberhorne Farm Courtyard

8.2 There are no specific conditions relating to built heritage, however general Condition 18 *: 'Approval of the details of the siting, design, appearance and landscaping of the site (hereinafter called the "reserved matters") shall be obtained from the Local Planning Authority, prior to the commencement of development of any relevant phase, and the development, for that phase, shall be carried out as approved'* is relevant for the purposes of this Statement.

8.3 Mid Sussex District Council's Conservation Officer, Historic England and the applicant all identified that the proposal would cause 'less than substantial harm' to the significance of the built heritage assets, with the degree of harm identified as varying. This harm was considered to be outweighed by the public benefits of the scheme.

8.4 This Built Heritage Statement has examined the proposed siting, design, appearance and landscaping of the Site, based on the Master Plan. Various mitigation measures have been implemented in respect of the relevant built heritage assets, building on feedback both during and following the outline planning application. It has been concluded that the proposals will reduce, though not remove in full, the harms identified as part of the outline planning application. Any such harms are assessed as falling within the lower end of the spectrum of less than substantial harm; the greater part of the significance of each listed building, as vested in their built forms and immediate setting, would be preserved.

8.5 Legislation and National Planning Policy and Guidance have been adhered to by affording the built heritage assets 'great weight', thus giving them due regard. Local Planning Policy SA20 of the SADPD is also adhered to.

Plates



Plate 1: View of the north elevation of the Grade II* listed Gullege from the public bridleway



Plate 2: View of west field to rear of the Grade II* Listed Gullege



Plate 3: Grade II* listed 1 – 3 Imberhorne Farm Cottages



Plate 4: Grade II listed Imberhorne Farmhouse and adjacent buildings



Plate 5: View northwards across Site from Bridleway 44b/EG/1

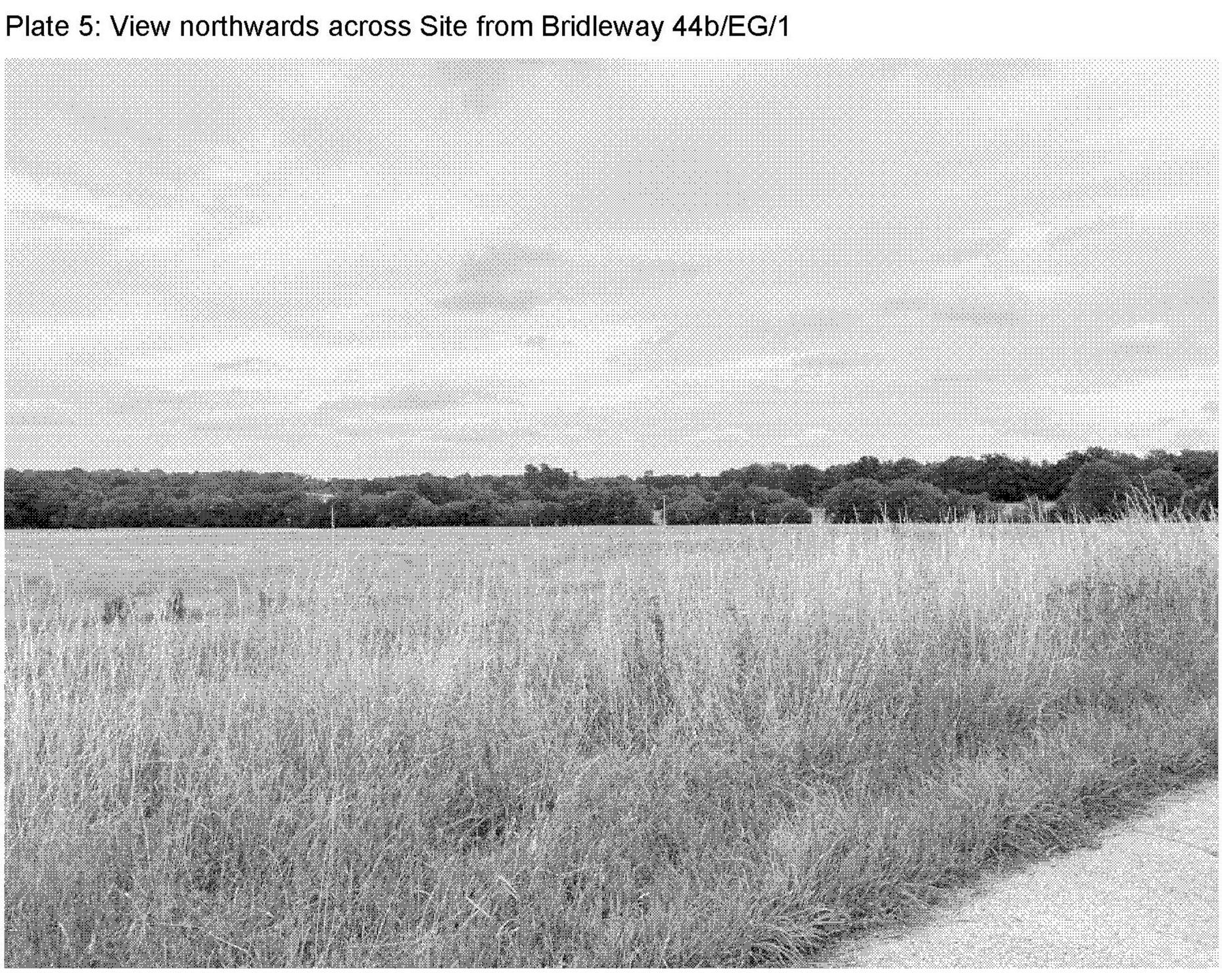


Plate 6: View northeast across Site from Bridleway 44b/EG/1



Plate 7: View south-west across Site from Bridleway 44b/EG/1 towards the grounds of the Grade II* listed Gullege (located to rear of vegetation to left of Bridleway)



Plate 8: View north-west across Site from Bridleway 44b/EG/1



Plate 9: View eastwards along Bridleway 44b/EG/1 with Site to left of image



Plate 10: View northwards from east field of Site



Plate 11: View north from south edge of Site with east field of Site behind boundary hedge to right



Plate 12: View south/south-east from centre north of Site

Figures

Figure 1 – Masterplan



Figure 2 – Landscape Plan

