

MID SUSSEX

DISTRICT COUNCIL

Town and Country Planning Act 1990

PROOF OF EVIDENCE
Emily Wade MA MSc
On behalf of Mid Sussex District Council

Planning Inspectorate Refs:

Appeal Ref: APP/D3830/W/24/3350075

Local Authority

Refs:

DM/24/0446

Appeal by:

Gladman Developments

Appeal Site:

Land off Scamps Hill, Lindfield

Proposal:

The erection of up to 90 dwellings with public open space, landscaping and sustainable drainage system and vehicular access point. All matters reserved expect for means of access.

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3. Plan relating to land at Birchgrove Road, Horsted Keynes showing the appeal site and Horsted Keynes Conservation Area Boundary. (APP/D3830/W/20/3261311).
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My name is Emily Wade and I am a Conservation Officer for Mid Sussex District Council. I have a Masters degree in Historic Conservation. I have worked at Mid Sussex District Council for 10 years and prior to this have previously worked in a similar capacity for a number of other authorities in London and the South East.

The evidence given in this proof is true and constitutes my professional opinion.

1.0 Introduction, reason for refusal and policy context

1.1 My evidence addresses the impact of the proposed development which is the subject of this appeal on the adjacent heritage assets. I was the Conservation Officer advising on the planning application which is the subject of this appeal.

1.2 The application subject of this appeal was validated on 23rd February 2024 with a determination date of 24th May 2024. A new Access Drawing was submitted on 15th April 2024. An extension of time was agreed until 31st July 2024 to allow the applicant time to submit an Ecological Impact Assessment which was issued on 23rd July 2024. A second statutory consultation exercise was launched enabling stakeholders to consider the additional evidence until 30th August before which a decision could not be made, but the appeal was submitted on 14th August.

1.3 Due to the timing of the appeal submission, the local planning authority was unable to report the application to planning committee to ascertain what decision it would have made had it been in a position to determine the application. Instead, the local planning authority assessed the case through an internal officer process and determined that had the Council had the opportunity to determine the application it would have been refused for four reasons, one of which related to the impact on adjacent heritage assets, as follows:

'2. The proposed development will cause less than substantial harm to the Lindfield Conservation Area, and the nearby listed buildings known as Greyfriars and Tythe Cottage. In addition, the proposal will cause a high level of harm to an asset of a high level of significance within the local context, this being the non-designated heritage asset of Walstead Grange. The application therefore conflicts with Policies DP34 and DP35 of the Mid Sussex District Plan and the NPPF.'

2.0 Relevant legislative and planning policy context

2.1 The following legislation and planning policies are considered relevant to this proposal in regard to built heritage considerations.

2.2 National Planning Legislation

2.3 Legislation relating to the Historic Environment is primarily set out within the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the 1990 Act') which provides statutory protection for listed buildings and conservation areas. In regard to listed buildings and their setting, s.66 states that:

2.4 *'In considering whether to grant planning permission [or permission in principle] 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'*.

2.5 Section 66 is engaged in this case in relation to the listed buildings referred to in the reason for refusal.

2.6 In the 2014 Court of Appeal judgement of *East Northamptonshire District Council v SSCLG* [2014] EWCA Civ 137 (the 'Barnwell Manor case') Sullivan LJ held that [para.29]:

2.7 *'Parliament's intention in enacting section 66(1) was that decision makers should give "considerable importance and weight" to the desirability of preserving the setting of listed buildings when carrying out the balancing exercise'*.

2.8 The Court of appeal held in *Jones v Mordue* [2015] EWCA Civ 1243 (the 'Mordue case') that, with regards to the setting of Listed Buildings, generally where a decision-maker works through the paragraphs of the NPPF in accordance with their terms (in particular Paragraph 134 of the previous version of the NPPF, the requirements of which are now given in Paragraph 196 of the revised NPPF, see below), they will have complied with the duty under section 66(1) of the 1990 Act.

2.9 The 2017 Court of Appeal judgment in *R(Williams) v Powys CC* [2017] EWCA Civ 427 (the 'Williams case') has clarified that the duty to have special regard to the desirability of preserving the setting of a listed building would be engaged where there is a visual relationship between the proposed development and the listed building *'which is more than remote or ephemeral, and which in some way bears on one's experience of the listed building in its surrounding landscape or townscape'* [para.56] Physical proximity is not always essential: mutual visibility from a distant viewpoint might be relevant.

2.10 The 2018 Court of Appeal judgment in *Catesby Estates Ltd v Steer* [2018] EWCA Civ 1697 (the 'Catesby case') has clarified that the duty imposed by the Section 66(1) of the 1990 Act to have special regard to the desirability of preserving the setting of an asset requires the decision-maker to determine the extent of the asset's setting and the impact of the development upon it. In doing so, the decisionmaker had to take account of social, historical, and economic, as well as physical and visual, factors.

2.11 **The Development Plan**

2.12 Local planning policy is primarily contained within the Mid Sussex District Plan (adopted March 2018).

2.13 Policy DP34: *Listed Buildings and Other Heritage Assets*, states that:

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

A thorough understanding of the significance of the listed building and its setting has been demonstrated. This will be proportionate to the importance of the building and the potential impact of the proposal;

[...];

Special regard is given to protecting the setting of a listed building; and

[...].

2.14 Policy DP35: *Conservation Areas*, states that:

'[...] Development will also protect the setting of the conservation area and in particular views into and out of the area'.

[...].

2.15 The Neighbourhood Plan

2.16 Further local planning policy is set out in the Lindfield and Lindfield Rural Neighbourhood Plan (made March 2016). However, it contains no policies which are relevant to the protection of heritage assets.

2.17 Mid Sussex District Plan 2021-2039 Consultation Draft

2.18 The District Council is reviewing and updating the District Plan. Upon adoption, the new District Plan 2021 - 2039 will replace the current District Plan 2014-2031 and its policies will have full weight. In accordance with the NPPF, Local Planning Authorities may give weight to relevant policies of the emerging plan according to the stage of preparation; the extent to which there are unresolved objections to the relevant policies; and the degree of consistency of the relevant policies in the emerging plan to the NPPF. The draft District Plan 2021-2039 (Regulation 19) was published for public consultation on 12th January 2024 for six weeks and as a result of this consultation there are unresolved objections to the majority of Policies in the draft District Plan. As such, only minimal weight can be given to the Plan and the planning application subject of this appeal has been assessed against the policies of the adopted District Plan.

2.19 Relevant policies:

DPB2 Listed Buildings and Other Heritage Assets

DPB3 Conservation Areas

2.20 National Planning Policy Framework

2.21 The National Planning Policy Framework (NPPF) was published in February 2019, and updated in July 2021 and in December 2023.

2.22 Annex 2 defines 'designated heritage assets' to include 'Listed Building' and 'Conservation Area' designated under the relevant legislation.

2.23 Paragraph 201 states that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They

should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

2.24 Paragraph 205 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. This paragraph also discusses how substantial harm to different assets should be considered. Substantial harm is not alleged in this case.

2.25 Paragraph 208 deals with circumstances where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, confirming that this harm should be weighed against public benefits of the proposal, including, where appropriate, securing its optimum viable use.

Paragraph 209 requires that in weighing applications that directly or indirectly affect non-designated heritage assets (NDHAs), a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

3.0 Affected heritage assets and their settings

Methodology of assessment

3.1 The appropriate methodology to identify potentially affected assets; to assess their significance; and to assess the Appeal Scheme's likely impact on that significance is derived largely from the heritage-based policy, guidance and advice set out in the NPPF and, the PPG, and Historic England's guidance in GPA3 The Setting of Heritage Assets (second edition) [CDXX], Conservation Principles, Policies and Guidance, and. *Statements of Heritage Significance: Analysing Significance in Heritage Assets*.

3.2 In line with the staged approach advocated in Part 2 of the Historic England Good Practice Advice note, 3 this evidence will identify which heritage assets and their settings are affected (this is also set out in the Reason for Refusal, above), assess the degree to which these settings make a contribution to the significance of the heritage assets or allow their significance to be appreciated, and assess the effects of the proposed development on that significance or on the ability to appreciate it. It will also comment as appropriate on whether the proposals have explored ways in which to avoid or minimise the harm caused.

Affected heritage assets and their settings

3.2 In assessing the impact of the proposal on nearby heritage assets I have used the staged approach set out in the relevant Historic England guidance GPA Note 3 *'The Setting of Heritage Assets'*.

3.3 Using this approach I consider that the appeal proposal affects the settings of a number of heritage assets. These are the Lindfield Conservation Area, the Grade II listed buildings at Greyfriars, Gravelye Lane; Tythe Cottage, Scaynes Hill Road; and the former farmhouse and historic farmstead at Walstead Grange, Scaynes Hill Road (which is regarded as an NDHA).

3.4 The Lindfield Conservation Area

3.5 The boundary of the Lindfield Conservation Area is located approximately 150m to the north east of the site boundary along Lewes Road. The Area is focused on the historic centre of Lindfield village and the Common. Although the site and the Conservation Area are separated by a small amount of built development, there is some intervisibility between the site and various points on the Common in particular, to its northern and eastern edges, and the site contributes significantly to the semi-rural character of the approach to the village centre, including the Conservation Area, along Scamps Hill and Lewes Road from the south east.

3.6 The Council does not have an adopted character appraisal for Lindfield Conservation Area, however its document *'Conservation Areas in Mid Sussex'* provides a brief high level assessment, and states that: *'Lindfield has a strong individual village identity with a pond, a common, a church dating from the 13th century and a High Street...'* In my opinion, the significance of Lindfield Conservation Area lies in its nature as a historic Sussex village which has grown up over many centuries in close connection with the surrounding landscape.

3.7 The surviving tangible connections between the Conservation Area and the countryside around Lindfield, which include open views from the northern part of the Area, limited views from the Common (including of the site) and the proximity of open countryside in the approaches from the north and from the south east (again including the site) all therefore contribute to the significance of the Conservation Area.

3.8 For these reasons the proposed development site is considered to make a positive contribution to the setting of the Lindfield Conservation Area. The site has particular significance as it is the one remaining area of undeveloped countryside which is visible from within the southeastern part of the Area, including the village common. It is also particularly important in placing the Area within a wider rural context in terms of the approach to it from the southeast. These factors reinforce the identity of the Conservation Area as the historic heart of a rural Sussex village.

3.9 Greyfriars, Gravelye Lane.

- 3.10 Greyfriars is a modest Grade II listed cottage dating from c.1830. It was formerly known as Spire Cottage and is suggested within the statutory list description to have originally been a lodge or toll house.
- 3.11 The appellant's Heritage Statement suggests that it may have been the lodge to Gravelye House, an 1825-6 Grade II listed house located some distance to the south along Gravelye Lane, although this is not substantiated, and seems unlikely given the distance between the two, the seemingly public nature of the lane and the intervening farmsteads of Pesthouse and Gravelye Farms.
- 3.12 The suggested toll house role (mentioned in the list description) is also unsubstantiated and again appears unlikely given that there were two further toll points nearby at the centre of Lindfield village, across the High Street and at the mouth of Hickman's Lane. Both these tolls are shown on the first Ordnance Survey map of the area, but no toll point is shown at Greyfriars.
- 3.13 Based on the information in front of us, the building is considered to possess architectural value based on its design, construction and craftsmanship, as well as historical illustrative value as a good example of a small rural dwelling of its type and period (this would also relate to a former toll or lodge house role, if confirmed), and aesthetic value.
- 3.14 Historical map regression shows that when constructed, Greyfriars (then Spire Cottage) was situated in rural position outside Lindfield. More recently, the village has spread to the south and west so that the setting of the listed building is now semi-rural. The most significant remaining rural aspect of this setting is the application site, which affects both views from and of the listed building, including from Lewes Road, Scamps Hill and Gravelye Lane, and the character of the approaches to it along Lewes Road and Scamps Hill.
- 3.15 The potential (although speculative) former role of the building as a toll or lodge house would mean that the adjacent roads would be a significant part of the setting of the listed building, relating to its former use. However, the surviving rural setting to the east is also significant in indicating the out-of-village context within which the building was originally constructed, potentially as part of the rural estate then associated with Gravelye House. It contributes positively to both its historical illustrative and aesthetic values, and the most important part of that rural setting is the application site, which is directly opposite the listed building.
- 3.16 Tythe Cottage, Scaynes Hill Road
- 3.17 Tythe Cottage is a Grade II listed 18th century cottage located to the north of Scamps Hill in close proximity to the historic farmstead at Walstead Grange, such that it is tempting to speculate that there may have been a historical relationship of function between the two, although the appellant's heritage statement notes that the cottage and farmstead were in different ownership by 1848. Historical

map regression certainly suggests that they were linked by a common entrance track, in much the same way as they are today.

- 3.18 Based on the information in front of us, I consider the significance of Tythe Cottage is drawn from architectural value based on its construction and craftsmanship, historical illustrative value as a good example of a rural Sussex dwelling of its period, and aesthetic value based in part on the use of vernacular materials viewed within the landscape from which they were drawn. The Cottage also has group value with the historic farmstead at Walstead Grange - there is clear intervisibility between the two, and the farmstead forms part of the context within which the Cottage is appreciated (and vice versa).
- 3.19 The surviving rural setting within which the listed building is experienced makes a strong positive contribution to its special interest and the manner in which this is appreciated, in particular those parts of that interest which are drawn from historical illustrative and aesthetic values.
- 3.20 At present, although there is more modern development to the south of the listed building, this is relatively well screened, so that little in the way of built form other than the historic farmstead at Walstead Grange and a couple of houses to the opposite side of Scaynes Hill Road is visible from the Cottage or its immediate setting. The building enjoys a sense of relatively tranquil, rural isolation, and of separation from Lindfield village and from the modern, ongoing development at Ivy Drive/Walstead Park adjacent to the junction with East Mascalls Lane.
- 3.21 The application site forms a significant element of the surviving rural setting of the Cottage, forming the greater part of the wider context to the west of the building, although separated from it by Walstead Grange (see below). There is direct intervisibility looking through the buildings of the historic farmstead between the Cottage and the south-eastern field of the site, as well as with the hill ridge which forms the boundary between this and the central field.
- 3.22 The site also influences the character of the approach to Tythe Cottage from the direction of Lindfield and the entrance driveway, and it contributes positively to a sense of separation between the listed building, in its historical rural context, and the modern spread of Lindfield village.
- 3.23 Walstead Grange
- 3.24 In my view, is the farmstead at Walstead Grange (formerly known as Beadles Farm) is an NDHA of a high level of interest within the local Mid Sussex context. The Heritage Statement submitted with the appeal proposal suggests that the former farmhouse may be of 16th century origin, but extended in the 19th century and later. It also states that a number of former farm buildings survive around the house, an observation which is confirmed by on-site inspection. The farmstead is also recorded in the West Sussex Historic Farmstead and Landscape Character Assessment as a historic farmstead of the post Medieval period (see Appendix 2).

- 3.25 In my view, given the former agricultural function of the farmstead, the surviving rural setting around it (which consists in large part of the application site) would be considered to make a strong positive contribution to the significance of the NDHA. The 1848 Tithe Map which is reproduced in the applicant's Heritage Statement suggests that the farmlands associated with the tenancy at Beadles Farm consisted largely, if not entirely, of the fields forming the application site. In my opinion this historical functional relationship serves to strengthen the contribution made by the site to the setting and significance of the NDHA.
- 3.26 The appeal site is extremely prominent in views looking north east from the farmhouse and farmstead, including in particular the south eastern field, but also the south eastern part of the central field which sits on the brow of the hill above.
- 3.27 The appeal site contributes to the setting of the farmstead not only through direct intervisibility, but also in terms of the character of the approach to the farmstead along Scamps Hill from the north. It provides an important buffer of undeveloped, rural land between the farmstead and the modern development of Lindfield to the north and west.

4.0 Impact of the proposed development on the affected heritage assets.

4.1 As set out in GPA Note 3, having identified the affected assets, and the contribution to their significances made by setting including the appeal site, I have moved on to consider the impact of the proposal on the character of the site and the contribution which this makes to these significances, and whether that impact is positive, neutral or harmful. In all cases, I have identified a degree of harm caused by the fundamental impact of the proposed development on the currently agricultural character of the site.

- In relation to designated heritage assets, where harm is identified, as required by the NPPF I will state whether I consider this harm to be substantial or less than substantial.
- Where less than substantial harm is found, I will state whether I consider this to be minor, moderate or high, with the upper point of that scale being just less than substantial harm.
- With respect to the non-designated heritage asset at Walstead Grange, as required by the NPPF I will state whether I consider the harm identified to be minor, moderate or high. I have already stated above that the Council considers the asset to be of a high level of significance in the local context.

4.2 This is in order to assist the planning balancing exercise carried out elsewhere in the Council's evidence by Mr Giles.

4.3 Lindfield Conservation Area

4.4 The relationship of the appeal site to the Conservation Area and the positive contribution which it makes to the setting and hence the special character of the Area is described above at 3.3 onwards.

4.5 The appeal proposal is in outline only, but shows the two northern fields making up the site suburbanised as a residential development of up to 90 homes with associated infrastructure and two new vehicle entrances from Scamps Hill. The south eastern field would be developed as a 'public open space'.

4.6 The northern part of the site would therefore become a suburban enclave, which would fundamentally alter its existing open and rural character. The southern part of the site, while remaining more open, would also lose its current and historic agricultural nature, taking on more of the character of parkland. The traditional rural, agricultural character of both parts of the site would be lost.

4.7 This will reverse the positive contribution currently made by the site through impact on setting to the character and appearance of the Conservation Area.

4.8 The development would have a small but noticeable impact on views from within the Area itself, including from several viewpoints on or adjacent to the Common, particularly looking from its northern side, and from its south eastern corner along Lewes Road towards Scamps Hill. Although these views are partial or glimpsed they are, as noted above, the only remaining views of open countryside from this southern part of the Conservation Area, and the only remaining tangible connection between this part of the historical core of the village and the rural landscape within which it developed. The existing rural character of these views (which include trees and grassland) would be significantly adversely impacted by the introduction of the proposed housing development and associated works within the two north western fields of the site.

4.9 The appeal proposal would also have a fundamental impact on the surviving semi-rural character of the approach to Area from the south east along Scamps Hill, which is one of the principal approaches to the Conservation Area. The impact in this respect would be cumulative with the recent development to the south west of Scamps Hill and at Ivy Drive/Walstead Park further south east along Scaynes Hill Road, and would result in a greater coalescence of development stretching from the junction of Scaynes Hill Road and East Mascalls Lane north west into the village centre and the Conservation Area. Any sense of connection between the Area and the surrounding countryside would be significantly diminished, or lost.

4.10 This will be contrary to the requirements of District Plan Policy DP35, which requires that development will protect the setting of a conservation area and in particular views into and out of the area.

4.11 In terms of the NPPF I would consider the harm caused to the significance of the Conservation Area to be less than substantial, at minor-moderate range of the

scale identified above. Paragraph 208 of the NPPF will therefore in my opinion apply and the harm identified should be weighed against the public benefits of the proposal. This balancing exercise is carried out elsewhere by Mr Giles.

4.12 This conclusion is in contrast to the appellant's position, which is that a Conservation Area would be unaffected by the appeal proposal, so that a detailed assessment of the impact of the proposal on this asset was not carried out. In this regard, there is a relevant appeal decision which I would draw to the Inspector's attention, which was made in relation to a proposal for up to 32 new dwellings on agricultural land at Birchgrove Road, Horsted Keynes, within the setting of the Horsted Keynes Conservation Area (APP/D3830/W/20/3261311). Of particular relevance is the Inspector's finding that, notwithstanding the distance between the boundary of the Conservation Area and the appeal site (approx. 180m, c.f. the approx. 150m of separation in the current case) and the presence of intervening modern development to either side of Birchgrove Road, the channelled views along the road from within the Area to the rural land forming the appeal site contributed positively to the character and appearance of the Conservation Area. The Inspector also found that the open and rural character of the appeal site contributed positively to the context within which the Conservation Area was appreciated in terms of the approaches to it along local roads. A copy of the relevant appeal decision was appended to the Council's Heritage Statement of Case. A plan showing the appeal site and Conservation Area boundary is appended here at Appendix 3.

4.13 Notwithstanding that each case must be considered on its own merits, it is my opinion that similar circumstances apply in relation to the current appeal scheme. In this case the site is closer to the Conservation Area than was the case at Birchgrove Road.

4.14 Greyfriars.

4.15 As noted above, the application site is the most significant remaining part of the rural aspect of this setting of Greyfriars in views from and of the listed building. These include not only views from the house and its immediate garden setting looking across Scaynes Hill Road, but also views and vistas including the listed building looking along this road in either direction, and looking north east along Gravelye Lane, in which the site constitutes a significant part of the context within or against which Greyfriars is appreciated.

4.16 This surviving rural setting is significant in indicating the out-of-village context within which the building was originally constructed, potentially as part of the rural estate then associated with Gravelye House.

4.17 The proposed development would result in a fundamental impact on this rural character, particularly to the two north western fields, which would become a suburban enclave.

4.18 This would have a significant detrimental impact on the contribution which the site makes to the setting of Greyfriars, and the manner in which the heritage

values contributing to the listed building's special interest are appreciated, in particular its historical illustrative value as a modest rural cottage of the early 19th century, possibly developed as a lodge to a country estate, and its aesthetic value.

4.19 In my view, this impact would amount to less than substantial harm, through impact on setting, to the special interest of the listed building. This harm lies at the moderate to high range of the less than substantial scale, because of the proximity of the site, its significance to the character of the setting of Greyfriars, an originally rural building, and its nature as the last remaining rural element of that setting.

4.20 This is in contrast with the appellant's view, which is that a low level of harm would be caused to Greyfriars. This view appears to be based on the assumption that Greyfriars was originally the lodge house to Gravelye House to the south west, and as such more emphasis is placed on the relationship between the building and the adjacent roads, and the distant relationship with Gravelye House, than on the contribution of the site to the building's setting.

4.21 However, it is my view that the suggestion that Greyfriars was a lodge house is highly speculative, and can attract little weight. Furthermore, if proved, this would not reduce the positive contribution made by the site to the setting and special interest of the building, as the site would constitute the sole surviving rural element of the setting of the country estate of which the appellant speculates that Greyfriars was part.

4.21 As set out above s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting.

4.22 Considerable importance and weight must be attached to the desirability of preserving the setting of listed buildings when balancing the advantages of the proposed development against any identified harm: East Northamptonshire DC v SSCLG [2014] EWCA Civ 137.

4.23 The appeal proposal is contrary to the requirements of District Plan Policy DP34, which states that development will be required to protect listed buildings and their settings.

4.24 The NPPF requires that where harm is identified to a designated heritage asset or its setting, this should be identified as either substantial or, in accordance with paragraph 208, less than substantial. In accordance with paragraph 208 of the NPPF, the harm identified should be weighed against the public benefits of the proposal. This balancing exercise is carried out by Mr Giles.

4.25 Tythe Cottage

4.26 The Appellant's view is that Tythe Cottage is unaffected by the appeal proposal, with the result that a detailed assessment of the impact on Tythe Cottage does not form part of the submitted heritage statement.

4.27 I disagree with that assessment. As discussed above, the existing rural character of the appeal site makes a strong positive contribution to the setting of Tythe Cottage, including views looking north west from the building through the historic farmstead at Walstead Grange, and the wider approach to the Cottage along Scaynes Hill Road. It also contributes to a sense of separation between the Cottage and the residential development around Lindfield village.

4.28 The proposed development will have a fundamental impact on the character of all three fields comprising the site, and although the 'parkland' of the south eastern field is closer to and most visible from the Cottage, the residential development of the northern western fields is also likely to be visually prominent at the crest of the hill. As noted above, the Cottage currently enjoys a largely uninterrupted sense of rural isolation, with little visible development other than the historic farmstead at Walstead Grange.

4.29 The proposed 'public open space' which is shown to the south-eastern field will result in a significant change in the character of this space, which will become managed, suburbanised parkland, and will no longer be understood for its historical agricultural character and role. For example, it is noted that the appellant's Statement of Case refers to new parkland planting (1.4.3), '*substantial new recreational routes*' (1.9.1), and a children's play area (1.9.1). Features of this nature, as well as other likely necessary associated items such as bins and signage, and a consequent increase in noise and activity, will fundamentally alter the historically agricultural character of the land. This will reverse the positive contribution which the site currently makes to the special interest of Tythe Cottage and the manner in which this is appreciated,

4.30 In this regard, I would draw the Inspector's attention to the recent appeal decision concerning an application for up to 120 new dwellings on land to the south of Henfield Road, Albourne (APP/D3830/W/23/3319542). Like the appeal scheme, this application proposed the creation of public open space on an existing agricultural field adjacent to a Conservation Area and several listed buildings. The Inspector found that notwithstanding the outline nature of the application the proposed managed parkland open space would change the use and visual appearance of the land, and would result in the loss of its agricultural character. This would (in addition to the impact of the proposed housing on the other parts of the site) detract from the positive contribution made by the site to the setting of the Conservation Area and of several of the listed buildings considered. A copy of this appeal decision was appended to the Council's Heritage Statement of Case, and a site plan showing the appeal site and adjacent heritage assets is added here at Appendix 4.

4.31 Although each case must be considered on its own merits, it is my view that the Albourne Inspector's comments on the impact of the proposal on the character of the agricultural field and its contribution to the settings of these assets are relevant.

4.32 I consider that the current appeal scheme is contrary to District Plan Policy DP34, and would cause less than substantial harm at the minor-moderate range of the scale. In accordance with paragraph 208 of the NPPF, the harm identified should be weighed against the public benefits of the proposal. Again, this balancing exercise is carried out by Mr Giles.

4.33 Walstead Grange

4.34 The positive contribution made by the appeal site to the setting of Walstead Grange as an NDHA is set out above. It is common ground that Walstead Grange is an asset of a high level of significance in the local context.

4.35 As also discussed above, the proposed parkland development of the south-eastern field will be likely to remove its current and historic agricultural nature in favour of a more suburban character, with parkland planting, pathways, bins etc. as well as an increase in noise and activity. The proposed residential development of the central field is also likely to be visually prominent on the crest of the hill. This will have a fundamental impact on the character of the setting immediately to the north-west of the farmstead, which is very prominent in views from the farmhouse and its surrounding former farm buildings. It also forms the backdrop against which the farmstead is appreciated in views along the entrance track from the direction of Tythe Cottage.

4.36 The proposed development will also remove the existing sense of separation of the historic farmstead from the more modern suburban spread to the south and east of Lindfield village.

4.37 It is the appellant's view that only a minor level of harm will be caused by the appeal proposal to the significance of Walstead Grange. This assessment of harm appears to be based partly on an assertion that the field immediately to the north east of the former farmstead was more recently used as a parkland extension to the gardens to the house. However, there seems to be very little evidence to support this conclusion besides alterations to the field boundaries during the later 19th century, which might equally have resulted from changes in agricultural practices and the operation of the farm at that time. Certainly, the field is currently not managed as parkland, and on my most recent site visit, it was being used to graze sheep. In my view, its use is for agriculture, and the proposed changes to this, together with the views of the new development in the adjoining field will result in a high level of harm to an asset of a high level of interest in the local context.

4.38 In accordance with para 208 of the NPPF, this harm needs to be weighed against the benefits of the appeal scheme. This balancing exercise is to be addressed by Mr Giles in his evidence.

5.0 Mitigation

5.1 The appeal proposal is in outline only, and as such we have only an indicative layout and the supporting documents provided with the planning application and with the current appeal to suggest what if any mitigatory measures would be included in a more detailed scheme. These measures seem to be limited to the site layout, including the creation of the public parkland in the south-eastern field, and to mention of proposed strengthening of existing tree and hedgerow planting in some areas.

5.2 The limited proposed mitigation strategies set out in the information in front of us are not considered to address the harm to the heritage assets set out above. In particular, I have discussed above the reasons why the creation of managed parkland in the south-eastern field adjacent to Walstead Grange and Tythe Cottage is not considered to prevent harm to their significances through adverse impact on the surviving rural character of their settings.

6.0 Summary

6.1 The special significances of the designated and non-designated heritage assets including the listed buildings and Lindfield Conservation Area have been identified. The existing rural character of the application site is considered to make a positive contribution to the manner in which these significances are appreciated, including views from and towards the assets and in some cases the approaches to them along adjacent roads.

6.2 The appeal proposal is considered to have a fundamental impact on the currently rural and verdant nature of the site, such that it would become suburbanised, or to the south-eastern field would have the character of managed parkland rather than agricultural land.

6.3 This would reverse the positive contribution that the site currently makes to the settings of these assets, including views, to the detriment of the manner in which their special significances are appreciated.

6.4 This would be contrary to the requirements of District Plan Policies DP34 (in respect of the identified listed buildings and the NDHA) and DP35 (in respect of the Lindfield Conservation Area).

6.5 In terms of the NPPF the harm caused to the significance of the designated assets is considered to be less than substantial, such that the criteria set out in paragraph 208 would apply, and I have identified above what degree of harm I ascribe in each case with greater specificity.

6.6 Consideration of the weight which must be attached to this harm, in the context of the planning balance required by paragraph 208 of the NPPF and, where appropriate, s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 as well as the overall planning balance, can be found elsewhere in the Council's evidence.



Historic England

Statements of Heritage Significance:

Analysing Significance in Heritage Assets

Historic England Advice Note 12





Summary

This Historic England advice note covers the National Planning Policy Framework requirement for applicants for heritage and other consents to describe heritage significance to help local planning authorities to make decisions on the impact of proposals for change to heritage assets. Understanding the significance of heritage assets, in advance of developing proposals for their buildings and sites, enables owners and applicants to receive effective, consistent and timely decisions.

This advice note explores the assessment of significance of heritage assets as part of a staged approach to decision-making in which assessing significance precedes designing the proposal(s). It also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements. Analysis of heritage significance may also be useful in development plan preparation, including site allocations and Minerals and Waste Local Plans.

Front cover: Abbey Mill,
Bradford on Avon

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1

Introduction

- 1** The purpose of this Historic England Advice note is to provide information on the analysis and assessment of heritage significance in line with the National Planning Policy Framework (NPPF) to assist owners, applicants, local planning authorities (LPAs), planning and other consultants, and other interested parties in implementing historic environment legislation, the policy in the NPPF and the related guidance given in the Planning Practice Guidance (PPG). In addition to these documents, this advice can usefully be read in conjunction with relevant Good Practice Advice and Historic England advice notes. Alternative approaches may be acceptable, provided they are demonstrably compliant with legislation and national policy.
- 2** The advice in this document, in accordance with the NPPF, emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance. At the same time those carrying out this work need enough information to understand the issues (NPPF, paragraphs 43-44 and 189).
- 3** This advice addresses the development of an analysis of heritage significance before discussing suggested structures for a statement of heritage significance.

2

General advice on assessing significance of heritage assets

Significance in the National Planning Policy Framework

National Planning Policy Framework: Conserving and enhancing the historic environment

189. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

4 Significance is one of the guiding principles running through the historic environment section of the NPPF. The NPPF defines significance as 'the value of a heritage asset to this and future generations because of its heritage interest'. Such interest may be archaeological, architectural, artistic or historic' and it may derive 'not only from a heritage asset's physical presence, but also from its setting'¹. Significance is what conservation sustains, and where appropriate enhances, in managing change to heritage assets².

¹ See Significance (for heritage policy) – NPPF Glossary.

² A variety of terms are used in designation criteria (for example, outstanding universal value for World Heritage Sites, national importance for scheduled monuments and special interest for listed buildings and conservation areas) but all of these refer to a heritage asset's significance.

5 It therefore follows from the NPPF requirement that an understanding of significance must stem from the interest(s) of the heritage asset, whether archaeological, architectural, artistic or historic, or a combination of these; and that this understanding:

- must describe significance following appropriate analysis, no matter what the level of significance or the scope of the proposal;
- should be sufficient, though no more, for an understanding of the impact of the proposal on the significance, both positive and negative; and
- sufficient for the LPA to come to a judgment about the level of impact on that significance and therefore on the merits of the proposal.

A staged approach to decision-making in applications affecting heritage assets

6 In practice developing applications for heritage-related consents will usually mean following a staged approach to decision-making. The development of proposals for change to heritage assets, and the consideration of subsequent applications based on the resultant proposals, benefits from a structured approach to the assembly and analysis of relevant information. A staged approach would usually embrace the following stages, informed by the scope of the proposal:

- 1. Understand the form, materials and history of the affected heritage asset(s), and/or the nature and extent of archaeological deposits**
- 2. Understand the significance of the asset(s)**

These two stages fulfil the requirement in paragraph 189 of the NPPF and are undertaken by the applicant.

- 3. Understand the impact of the proposal on that significance**

This stage fulfils the requirement in paragraph 190 of the NPPF and is undertaken by the LPA. However, the applicant needs to be aware of impacts so that the analysis of significance submitted to the LPA, under paragraph 189, is sufficient in its level of detail.

- 4. Avoid, minimise and mitigate negative impact, in a way that meets the objectives of the NPPF**
- 5. Look for opportunities to better reveal or enhance significance**

These two stages are addressed by the assessment of impact by the LPA but may also be addressed by the applicant in reaching a decision on the scope and design of a proposal. Indeed, assessment of these three

latter stages by the applicant prior to application may assist a positive assessment of impact by the LPA, thus leading to better outcomes for applicants, reducing both abortive work and delays.

7 This sequence, where design of the proposal follows investigation of significance, is better than the contrary, where proposals are developed and designed before significance has been assessed. Taking decisions about a proposal out of sequence – the staged approach - can lead to abortive work, raised costs and delays. Assessing significance before a proposal is planned can lead to better outcomes for the applicant by influencing the design by mitigating harmful impacts on significance, enhancing significance where possible, and thereby showing how any remaining harm is justified.

8 The NPPF requires only that significance is suitably assessed by the applicant, and does not prescribe a format or title for analyses of heritage significance and/or impact. Analysis of significance, in a statement of heritage significance, is related to wider descriptions of significance and impact, often called Heritage Statements, Heritage Impact Statements, and Heritage Assessments. All of these go further than statements of heritage significance by detailing the impact of a proposal on significance, how it can be avoided, minimised or mitigated, and its justification, if that is not possible, in whole or in part. Statements of heritage significance are an essential component of such statements and may form the first section where the staged approach is taken. Further information on a suggested structure for Statements of Heritage Significance is given in part 3 below.

9 Where potential or actual archaeological interest would justify expert investigation of a heritage asset, an archaeological desk-based assessment and, if necessary, a field evaluation is likely to be necessary. This is considered further in paragraphs 21-23 below. It is worth noting that a building or structure may have archaeological potential, in which case the field evaluation stage is better referred to as archaeological investigation, to avoid confusion (see also the [CIfA Standard and guidance for the archaeological investigation and recording of standing buildings or structures](#)).

10 In summary, what is needed is an impartial analysis of significance and the contribution of setting³. A Statement of Heritage Significance is not an advocacy document, seeking to justify a scheme which has already been designed; it is more an objective analysis of significance, an opportunity to describe what matters and why, in terms of heritage significance.

³ [The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 \(Second Edition\)](#) contains useful information on assessing the contribution of setting and views to the significance of heritage assets.

Assessing significance

11 Where the significance is not obvious, appropriate expertise would need to be used, as the NPPF points out (paragraph 189). Analysis would generally be undertaken by a suitably qualified specialist, expert in an appropriate branch of conservation, architectural history, garden history and/or archaeology, or, in more complex circumstances, group of specialists, who can describe significance in a way which is acceptable to the local planning authority and which therefore assists a successful application. For further information, see [Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2](#), which lists established registers that can be used to identify appropriately qualified specialists or organisations, depending on the nature of the project.

12 Where the potential for archaeological interest has been identified, the approach in paragraph 189 of the NPPF requires an applicant to submit an appropriate desk-based assessment and, where necessary, a field evaluation. The [ClfA Standard and Guidance: Historic Environment Desk Based Assessment](#) sets out what information should be included in a desk-based assessment, and the [ClfA Standard and Guidance: Archaeological Field Evaluation](#) similarly for evaluations (see also below, paragraph 22). For historic buildings, the Historic England advice note [Understanding Buildings: A Guide to Good Recording Practice](#) gives advice towards securing an understanding of the history of a building where conservation, repair or alteration is proposed.

13 The NPPF requirement, for applicants to describe, that is analyse, significance, and on local planning authorities to assess both significance and impact, may best be handled through a simple check-list approach and can usefully take the form of a short narrative statement for each assessment stage.

14 Cases involving more significant assets, multiple assets, or changes considered likely to have a major effect on significance will require a more detailed approach to analysis. Analysis may involve detailed assessment techniques and more complex forms of analysis such as sensitivity matrices and scoring systems. Whilst these may assist analysis to some degree, as significance and impact are matters of qualitative and expert judgement, they cannot provide a systematic answer. Historic England recommends that technical analyses of this type should be seen primarily as material supporting a clearly expressed and non-technical narrative argument that sets out ‘what matters and why’ in terms of the heritage significance of the assets affected, together with the impact of the proposal upon them. Further information on frameworks for Statements of Heritage Significance is given in part 3 below.

15 Deciding how to analyse heritage significance is likely to depend on the kind of heritage asset concerned, the nature of the proposal and the level of understanding of its history and significance at the time of application, though it is worth bearing in mind that all these approaches may be needed in especially complex cases:

- The context for any analysis of the significance of a heritage asset will be a thorough familiarity with the asset itself, developed through site visits, and appropriate inspection of the fabric, its features, materials and ornament, and also its setting if needed.
- Where the documentary history of a heritage asset is well established, there may be less need for primary documentary research but such research⁴, and related fabric, comparative and typological analysis, may be helpful where less is known, and may be augmented, where applicable (e.g. where archaeological interest is part of the significance of a historic building) by following the process in [ClfA's Standard and Guidance: Historic Environment Desk Based Assessment](#) (see below and [Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2](#), paragraph 12). It is worth bearing in mind that buildings and standing remains may equally have archaeological potential. Even where an extensive documentary history exists, research and related fabric and comparative analysis may still be needed, as also by following ClfA's standard and guidance on desk-based assessment, as above.

Other matters to be considered:

- Opening up and exploratory works to assess the condition of a heritage asset (as mentioned below, paragraph 18) may enable examination of fabric and features otherwise concealed or unknown. It is important to note that such works may in themselves require consent.
- The setting of the heritage asset may contribute to its significance and a landscaped or designed setting may itself need to be interpreted and understood. [The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3 \(Second Edition\)](#) contains useful information on assessing the contribution of setting and views to the significance of heritage assets.
- Where development proposals affect conservation areas, further advice on the appraisal, designation and management of conservation areas, including the assessment of special interest, can be found in [Conservation Area Appraisal, Designation and Management: Historic England Advice 1 \(Second Edition\)](#).

⁴ Documentary sources, and documentary history based on them, may tell of history from a particular perspective, prioritising particular voices and values, which may therefore distort the accepted history of a building or site.

16 It is worth underlining that a likely approach to reducing the impact on the heritage asset may simply be by designing the works to minimise the impact on significance.

17 In works to heritage assets, it is useful to recognise that the conception of a scheme and its design may not be a linear process; there may be cases where a constructive critique of the resolution of details may suggest changes as a scheme evolves. Design may not stop after works have begun and the statement of heritage significance should not therefore be regarded as final in its consideration of significance; more information may be revealed as the works progress, information which may inform a better understanding of significance in the same way that opening up works to assess condition before works start may also enable examination of the fabric.

Consultation and discussion with the local planning authority

18 The NPPF (paragraph 39) and the PPG (Before submitting an application: [The value of pre-application engagement](#)), emphasise the importance of early engagement and pre-application discussion between applicants and their advisors, statutory consultees and Historic England (where appropriate) and local planning authorities. Where the proposal is likely to affect the significance of heritage assets, applicants are encouraged to consider that significance at an early stage and to take their own expert advice. To ensure the assessment will be fit-for-purpose and to avoid unnecessary or damaging works, it is good practice for applicants to agree the precise extent and nature of the statement of heritage significance with the local planning authority before commissioning any work. This may best be carried out as part of pre-application engagement with the LPA. Some invasive assessment techniques may require formal consent, as may opening up and exploratory works to assess condition of fabric; the local planning authority can advise also as part of pre-application discussions.

Sources of information

19 The NPPF requires that, as a minimum, the relevant Historic Environment Record is consulted (NPPF, paragraph 189). Many local planning authorities additionally retain and publish lists of local sources of information which may be helpful in carrying out research on heritage assets. It is good practice to reference any sources of information used in preparation of the statement; this may help avoid lengthy reproduction of information and gives all parties a good understanding of the information consulted during the preparation of the statement.

20 Further information on sources for such Statements can be found in [Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2](#) and include:

- main local, county and national records (including the relevant Historic Environment Record)
- statutory designations (these can be accessed via the National Heritage List for England) and local lists
- the thematically-arranged Historic England Selection Guides for listed buildings, archaeological sites and historic parks and gardens, which give a broad overview of building and site types and subject-specific selection principles, and the various Introductions to Heritage Assets which cover archaeological, building and designed landscape topics in more detail
- the Pevsner Architectural Guides to the buildings of the counties of England and the volumes of the Victoria County History
- the records of statutory amenity societies
- the Heritage Gateway
- the Historic England Archive
- other relevant sources of information that would provide an understanding of the history of the place and the value the asset holds for society, for example historic maps, conservation area appraisals, townscape studies or the urban archaeology database, the archives of county and local societies and local record offices and archives
- Information on many buildings will have been published in local journals and other literature and map-based information will be available on historic Ordnance Survey maps

Archaeological evaluation

21 Paragraph 189 of the NPPF, quoted above, notes that ‘where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation’.

22 In some cases the need for archaeological investigation will be obvious from material in the local historic environment record or where advice given by local planning authorities’ historic environment

advisors suggests that archaeological interest exists. The archaeological interest of the site which leads to this conclusion may be independent of other interests, whether historic, architectural or artistic, but it may be associated in combination – all types of heritage asset may hold archaeological interest. Any archaeological investigation, carried out under [ClfA Standard and Guidance: Historic Environment Desk Based Assessment](#), and/or [ClfA Standard and Guidance: Archaeological Field Evaluation](#) or the [ClfA Standard and guidance for the archaeological investigation and recording of standing buildings or structures](#), should be allied closely with investigations by other specialists, where necessary, as, for instance, in the case of a listed building.

23 In order to ensure that the scope of the assessment or investigation meets the requirements of the local planning authority and avoids damage to heritage assets, it is good practice to discuss the scope of the work with the LPA and to agree a Written Scheme of Investigation, if necessary, before commencement, thus precluding abortive work (see paragraphs 34-40 of [Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2](#)).

Statements of Heritage Significance as part of a Design and Access Statement

24 The PPG outlines where Design and Access Statements are required. They are required for:

- Applications for major development
- Applications for development in a designated area (as defined in [section 9 \(5\) of the Town and Country Planning \(Development Management Procedure \(England\) Order 2015](#)), i.e. in a world heritage site or conservation area), where the proposed development consists of:
 - one or more dwellings; or
 - a building or buildings with a floor space of 100 square metres or more.
- Applications for listed building consent.

25 The PPG provides clear information about what Design and Access Statements are for and what they should include:

- They are intended to be ‘concise statements’ containing a level of detail proportionate to the complexity of the application.

- Their role as an analytical tool rather than simply a description of what is there is emphasised in its use as ‘a framework for applicants to explain how the proposed development is a suitable response to the site and its setting’, intended to aid decision-making by ‘enabling local planning authorities and third parties to better understand the analysis that has underpinned the design of a development proposal’ ([Paragraph: 029 Reference ID: 14-029-20140306](#)).
- The format is not prescriptive, but a Design and Access Statement must demonstrate the steps taken to appraise the context of the proposed development and how the design of the development takes that context into account - that is, how an understanding of significance has been derived and how it is addressed in the proposals ([Paragraph: 031 Reference ID: 14-031-20140306](#)).
- Design and Access Statements accompanying applications for listed building consent are explicitly required to include an explanation of the design principles and concepts that have been applied to the proposed works, and how they have taken account of:
 - a the special architectural or historic importance of the building;
 - b the particular physical features of the building that justify its designation as a listed building; and
 - c the building’s setting ([Paragraph: 032 Reference ID: 14-032-20140306](#)).
- Design and Access Statements accompanying applications for listed building consent must also provide information on any consultation undertaken, and how the outcome of this consultation has informed the proposed works ([Paragraph: 032 Reference ID: 14-032-20140306](#)).

26 The statement of heritage significance may therefore usefully be included as part of the Design and Access Statement. As an analytical tool, Design and Access Statements can be very useful in showing how a scheme has been designed so that adverse impacts on significance are avoided and/or minimised, for instance in the way the significance of a heritage asset has influenced its treatment or in the way that a proposal avoids or minimises harm otherwise caused to the asset in the way it is designed. Analysis of heritage significance therefore strongly supports the purpose of the Design and Access Statement.

27 Where a Design and Access Statement is required, the statement of heritage significance may form part of the Design and Access Statement, but note that, while the statement of heritage significance may form part of the Design and Access Statement, the Design and Access Statement is not a substitute for it. Indeed, the statement of heritage significance could

be rather more detailed in its analysis of significance, sources consulted, and so forth, and, where the heritage significance of an asset is a primary consideration, it may be appropriate for the analysis of significance and the impact assessment to be a separate document.

Statements of Heritage Significance and the Development Plan

28 As part of the work to ensure that the local plan, minerals local plan or waste local plan has up-to-date evidence of the historic environment, analysis and assessment of the significance of heritage assets and the contribution they make to the environment will be important, particularly in terms of site allocations. Analysis of heritage significance will be useful in assessing whether sites have the capacity to accommodate change/development as well as suggesting opportunities, including opportunities for enhancement. A sound site allocation is therefore likely to reference heritage assets and their settings, characterisation studies as well as relevant statements of heritage significance, before moving on to consider mitigation of impacts and so forth. The legislative and policy background to such approaches includes:

- the opportunities to draw on the contribution made by the historic environment to the character of a place (NPPF, paragraph 185)
- the need for due regard to legislative requirements (Planning (Listed Buildings and Conservation Areas) Act 1990)
- the requirement to Identify and assess the significance of a heritage asset that may be affected (NPPF, paragraph 190)
- and that great weight should be given to an asset's conservation (NPPF, paragraph 193).

Proportionality

29 While it is important that applicants should take full advantage of opportunities to analyse the significance of their heritage assets, and for local planning authorities to ensure that they have sufficient information to make an appropriate assessment, in the terms of the NPPF, it is also important that the level of detail given in a statement of heritage significance is proportionate to the impact of the proposal. However, while that analysis should be as full as necessary to understand significance, the description provided to the LPA need be no more than sufficient to understand the potential impact of the proposal on significance.

30 Therefore, where, for instance, the scope of the proposal is restricted to a part of a heritage asset, the analysis will assess the significance of the whole of the heritage asset, in as much detail as necessary to define significance, but the statement need only give sufficient confirmation of significance for the LPA to assess impact adequately. For very simple cases, for instance, or those where the impact on significance is minimal, the statement of heritage significance could simply form a part of the covering letter, included with the application for consent. See part 3 for advice about the level of significance/complexity of a proposal and the consequent level of assessment which may helpfully be provided.

31 Where more complex changes are proposed and the statement is begun at the outset of the scheme, it can be used not only to help influence the design but also in negotiation with the local planning authority. In this way, the statement can be used to explain how the proposal evolved and what is intended to be achieved. (See paragraph 195 of the NPPF and paragraphs 018 (Reference ID: 18a-018-20190723) and 020 (Reference ID: 18a-020-20190723) of the PPG).

3

The structure of Statements of Heritage Significance

A suggested structure for a statement of heritage significance

32 This suggested template is given as a generic model to illustrate one way of laying out a statement of heritage significance. In terms of the NPPF, there is strictly no need to go beyond the statement of significance, except in so far as the applicant needs to ensure that the description of significance is proportionate to the impact on that significance. However, the full staged approach is given here so as to help applicants putting together applications for consent.

33 The various sections of the suggested structure are described below, with recommendations as to content. This content will vary from one proposal/application to another, though certain sections, such as the Introduction, are likely to be needed in most, if not all, cases, and the description of the significance of the heritage asset is the central point of the statement. To show how the content of the assessment increases with significance and complexity, the headings for statements of heritage significance at three levels of proposed works – modest, more harmful and complex – follow.

1 Introduction

■ Purpose

What is the purpose of the Heritage Statement? A short note of the objective in preparing the statement, most often to support/explain an application for planning permission and/or listed building or other consent for certain works, is useful.

■ The Nature of the Proposal

Brief description of the proposal which forms the basis of the application. This might usefully set out a short outline of the proposed works, noting their scope and what they are expected to achieve – repair/alteration/extension – and whether they are internal or external.

A brief note of the parts of the heritage asset which would not be affected by the proposals may be useful, where the proposals are more complex.

- **Designation records for the heritage asset** (bear in mind that list descriptions and HER entries are intended to identify the asset only, not to describe significance):
 - The address, number and date of listing, schedule entry or equivalent of the designated heritage asset from the [National Heritage List for England](#) as well as the description.
 - Similar information from the local list, if locally listed.
 - Related designations, where relevant, for instance a registered historic park and garden where development is proposed in the setting, impacting on the park and garden, or a related scheduled monument affected by the proposal.
 - Any non-designated heritage assets affected by the proposal – it is worth noting that the great majority of sites of archaeological interest are not nationally designated, though they may have equivalent significance to sites which are designated.
 - A note of the extent of the curtilage of listed buildings, if a curtilage building is affected by the proposal.
- **Reference(s) in the local Historic Environment Record**
The site or building may be mentioned in the local Historic Environment Record. If the reference is relevant to the heritage asset, or is potentially affected, it should be mentioned here.
- **Archaeological Potential**
Where separate archaeological desk-based assessment and/or archaeological field evaluation have been carried out, or where an archaeological field evaluation is proposed in the light of the desk-based assessment, reference should be made here.
- **Planning History**
A brief overview of the planning history of the heritage asset is likely to be useful but this should be restricted to the context of the current application. Thus, in complex proposals, it may be longer but still be restricted to the previous history of related proposals; in the context, say, of a simple application for consent for a single interior feature, and where there is no related planning history, it will mention only the history of the current proposal.

A brief résumé of the nature of related discussions with the LPA is likely to be useful in setting the scene for the application.

Where a heritage asset is locally listed it is useful briefly to note the local planning policy background for its protection.

- **Consultations undertaken**
Consultations with expert bodies may have been undertaken. These may usefully be mentioned here, noting how responses received have informed the development of the proposal.
- **Approach and Methodology**
Methodology – it will be useful to add a short section outlining how the statement has arrived at the assessment. This could note
 - How the assessment of significance has been carried out
 - Literature and documentary research review
 - How the contribution to significance of setting and views have been assessed, where applicable

2 The heritage asset and its significance

Understanding the form and history of a heritage asset

Set out an understanding of the heritage asset, including, for instance, the historical development of the heritage asset and an analysis of its surviving fabric. An analysis of the setting of the heritage asset is only needed where changes to the setting by the proposal would affect the significance of the heritage asset or how that significance is appreciated.

- Following familiarity with the asset itself developed through visiting the site, carry out, where necessary, documentary research, architectural history and archaeological investigation, including, where necessary, fabric and comparative analysis, desk-based assessment and, if necessary, a field evaluation.
- In more complex cases a phased account of the development of the heritage asset, with a gazetteer may be useful.
- Photographs, both new and historic, of the heritage asset, and drawings including elevations for buildings, and detailed photographs of the features concerned, are always likely to be helpful. Plans and elevations, including historic drawings, showing historical development may also be useful, perhaps more often in more complex cases, photographs being likely to suffice in simpler cases. Part-plans may be less helpful, as they will not show the context for works.
- An understanding of the proposal – the changes which the owner wishes to make – is important at this point to ensure that the information provided to the LPA in the statement of heritage significance is directed only towards those matters crucial in terms of the changes proposed, and therefore the impact on significance.

- In the development of proposals, investigative works may be carried out which increase the understanding of the heritage asset. Such further understanding may usefully be noted here.

Assess the significance of the heritage asset

- For each heritage asset, describe the various interests (see PPG - paragraph: 006 reference ID: 18a-006-20190723):
 - **Archaeological interest**

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 skills, 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.
- Having described the various interests, assess the level of the general significance of the heritage asset and the particular contribution to that significance of any features which would be affected by the proposal, or of its setting if it, too, is affected by the proposal.
- Again in the development of proposals and during works, more information may become available which increases the understanding of the heritage asset, and of its significance. The opportunity may usefully be taken to re-appraise significance in such cases.

The applicant can assist the LPA's decision-making by setting out a clear and succinct explanation of the impact of the proposal on significance and how negative impact on significance has been avoided, by continuing to follow the staged approach, as shown below.

3 Impact on the significance

- Where the proposal affects the historic fabric of the heritage asset, specify the effect on that fabric including loss or concealment of historic features and fabric which contribute to significance, both inside and out, proposed removals and demolitions and the impact of alterations and extensions, where proposed, etc.
- In some cases, condition and structural surveys may usefully be quoted, to explain why a particular course has been chosen.
- Where the proposal affects the setting, and related views, of a heritage asset, or assets, clarify the contribution of the setting to the significance of the asset, or the way that the setting allows the significance to be appreciated. This may include the impact of the location of new development within the setting, of the impact on key views, the impact on the relationship of the heritage asset to its setting, etc.
- Where the proposal impacts both on the heritage asset directly and on its setting, a cumulative assessment of impact will be needed. Impacts both harmful and beneficial should be noted.

4 Avoid harmful impact(s)

- The NPPF stresses that impacts on heritage assets should be avoided. Therefore, show how the impact is to be avoided or minimised, for instance by the proposal being reversible.
- In some circumstances, the ability to appreciate significance may be enhanced or otherwise revealed by the proposal; this should be outlined here.
- As this may be a matter of the way the proposal has been designed, reference in the Design and Access Statement (where appropriate) is likely to be useful.

5 Justification for harmful impacts

- This is the opportunity to describe the justification for the proposal.

6 Recording

- Where there would be an impact on the significance of the heritage asset, detail any further archaeological analysis and recording proposed.

34 As the level of detail in a statement of heritage significance should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance (see [paragraph 5](#)), such statements will differ in length and treatment. The approach should therefore be proportionate according to circumstances. The following examples indicate how the material in a statement of heritage significance differs depending upon the significance of the asset and the scope of the proposal:

■ **Modest proposal to a heritage asset of lower significance: statement might cover**

Introduction - purpose, scope of the proposal, designation records for the heritage asset, references in the Historic Environment Record, planning history

Description of the asset and its significance - understanding of the history and form of the heritage asset, assessment of its significance

■ **More harmful proposal to a heritage asset of greater significance**

Introduction – purpose, scope of the proposal, designation records for the heritage asset , reference(s) in the local Historic Environment Record, archaeological potential (if relevant), planning history (if relevant), approach and methodology, consultations undertaken

Description of the form and history of the heritage asset

■ analysis of its surviving fabric, particularly that affected by the proposal and an analysis of the setting of the heritage asset, if relevant

■ details of documentary research, map regression, architectural history and archaeological investigation (note whether field evaluation suggested)

■ photographs and plans, both historic and contemporary, where necessary

Description of significance

■ description of the various interests: archaeological, architectural and artistic, and historic interest

■ assessment of the level of the general significance of the heritage asset and the particular contribution to the significance of any features and/or of its setting, affected by the proposal

■ concise explanation of the effect of the proposal on significance of the heritage asset and how harm to significance has been avoided, as a summary

- **Complex and harmful proposal to a heritage asset or assets of high significance**

Introduction – purpose, scope of the proposal including note of parts of asset not affected, designation records for the heritage asset, reference(s) in the local Historic Environment Record, archaeological potential, planning history, approach and methodology, consultations undertaken

Description of the form and history of the heritage asset and its significance

- full analysis of historical development with analysis of surviving fabric and full analysis of the setting of the heritage asset, where significance or ability to appreciate significance affected
- details of documentary research, map regression, architectural history and/or archaeological investigation – desk-based assessment and/or field evaluation
- production of phased account of the development of the site with a gazetteer
- photographs and plans, both historic and contemporary, showing evolution of heritage asset, where necessary
- note of any further investigative works necessary to further the understanding/analysis of significance of the heritage asset

Description of significance

- full description of the various interests: archaeological, architectural and artistic, and historic interest
- full assessment of the level of the general significance of the heritage asset and the particular contribution to the significance of any features and/or of its setting, affected by the proposal
- concise explanation of the effect of the proposal on significance of the heritage asset and how harm to significance has been avoided, as a summary

Succinct explanation of the impact of the proposal on significance of heritage asset(s) and how impact on significance, both positive and negative, has been avoided, by continuing to follow the staged approach - impact on the significance, avoid harmful impact(s), justification for harmful impacts, need for recording

A clear and succinct explanation of the effect of the proposal on significance of the heritage asset, and how any harm to its significance has been avoided, can be helpful, as a summary of the proposal

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Design: Historic England

MSDC Heritage Proof of Evidence

Appendix 2

Extract from Forum Heritage Services. 2006. Historic Farmsteads Landscape Character in West Sussex (unpublished document) via Heritage Gateway relating to Walstead Grange historic farmstead.

https://www.heritagegateway.org.uk/Gateway/Results_Single.aspx?uid=MWS13895&resourceID=1032

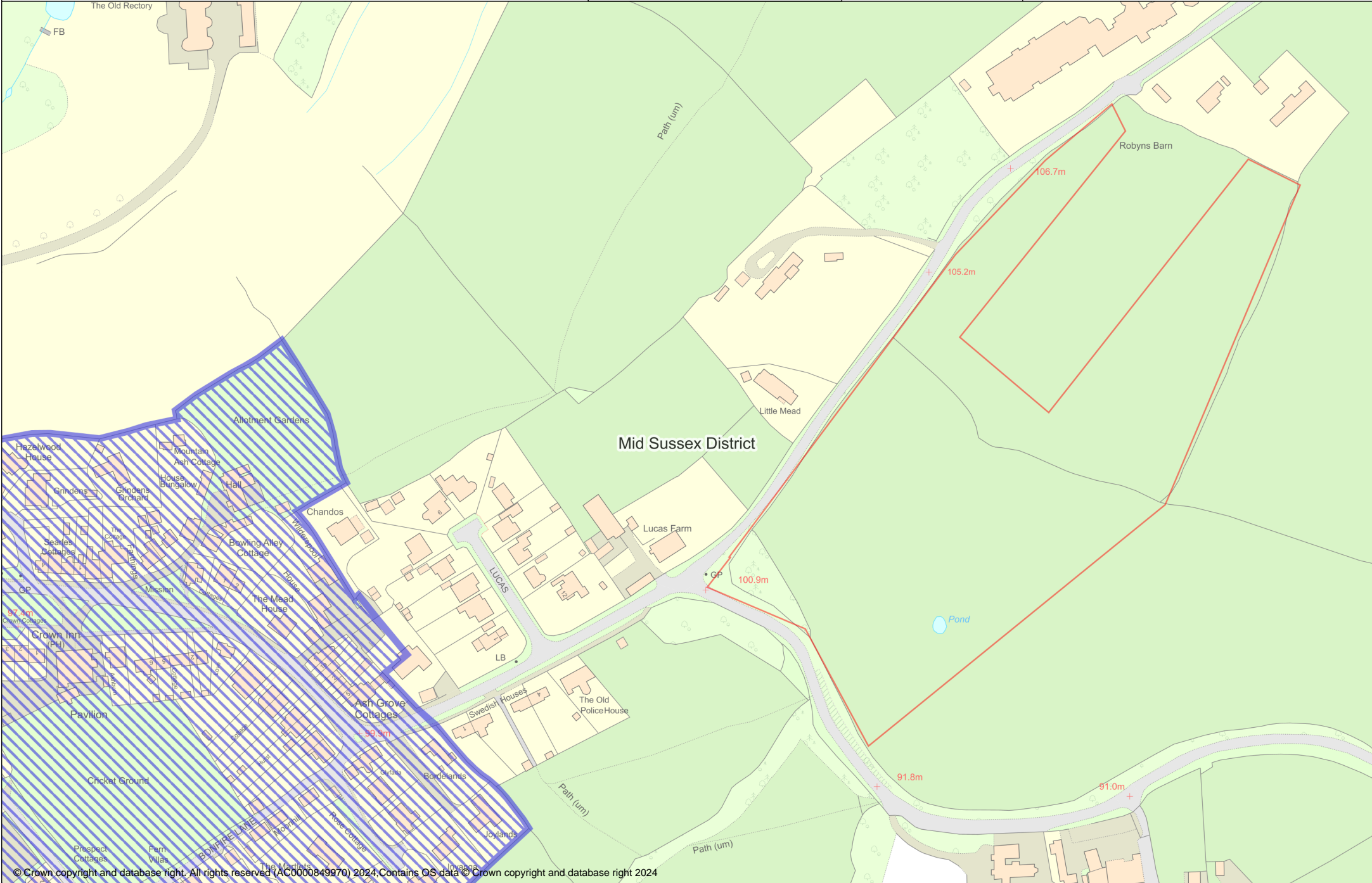
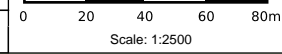
Land at Birchgrove Road Appeal Site

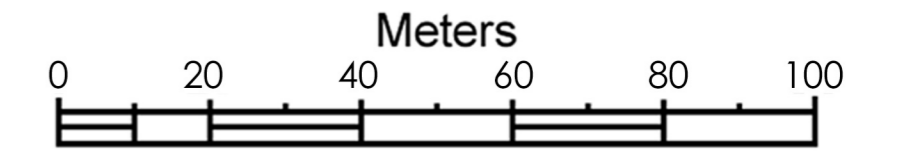
Mid Sussex District Council

Showing site boundary in red and Horsted Keynes Conservation Area hatched blue

Author: E. Wade

Date: 11/11/2024





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project:

Development off:

BIRCH GROVE ROAD,
HORSTED KEYNES
SUSSEX

title:

INDICATIVE BLOCK PLAN

date: June '19

scale: 1:1000 @ A1

drawing number:

1906/PL.03

Rev.

Paul Hewett R.I.B.A.

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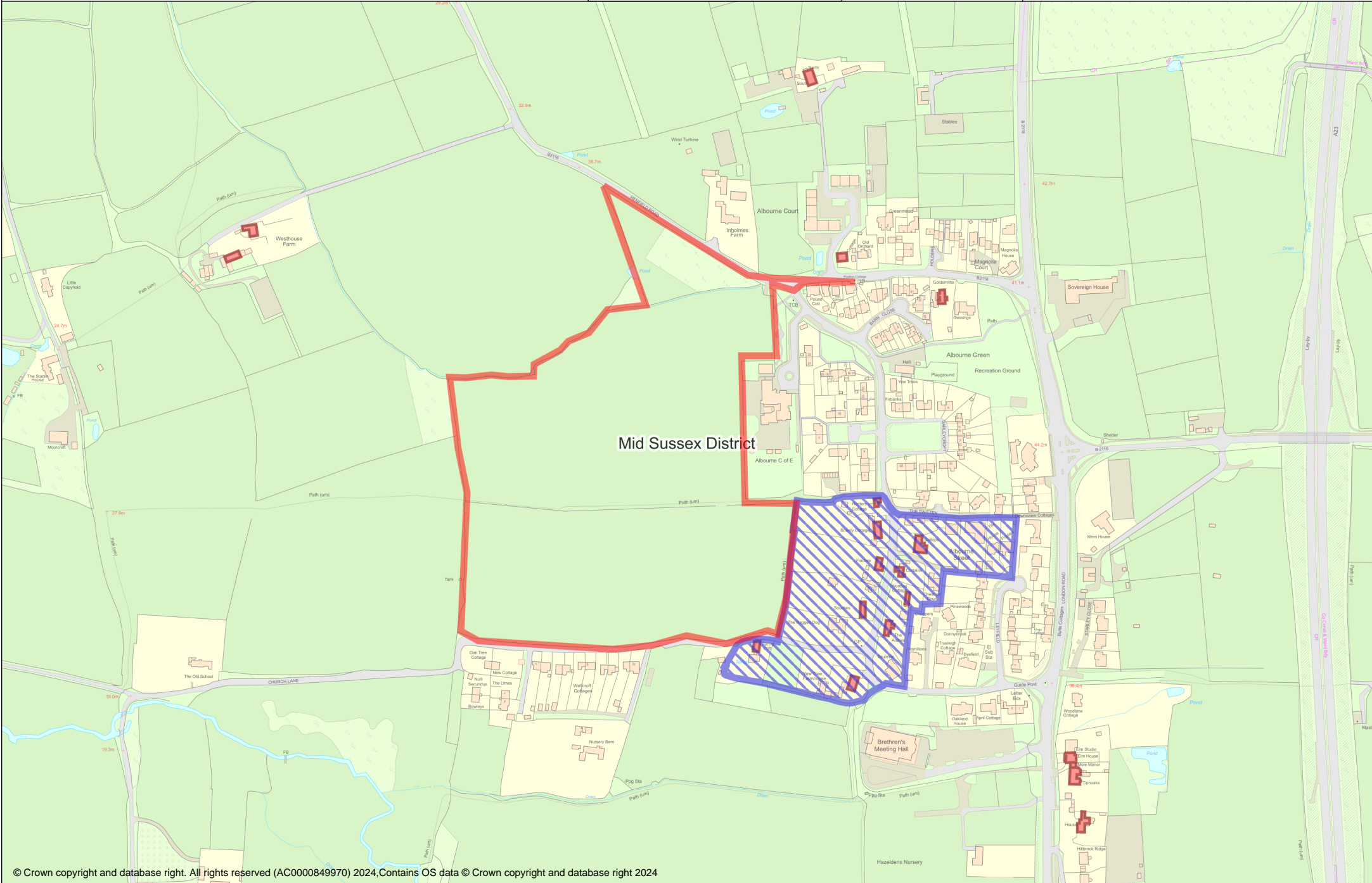
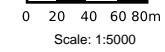
Land south of Henfield Road appeal site

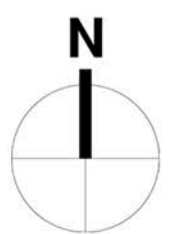
Showing site boundary in red and heritage assets

Mid Sussex District Council

Author: E. Wade

Date: 11/11/2024





0m 10m 20m 30m 40m 50m 100m
Scale

Croudace
HOMES.CO.UK

Client:
CROUDACE HOMES

Project:
HENFIELD ROAD, ALBOURNE

Drawing Title:
SITE SKETCH LAYOUT - FULL SITE

Scale:
1:1000 @ A1

Revision	Drawn	Check	Date
A	OT	JH	10/06/22



Project No'	Class	Dwg No'	Status	Rev
3117	C	1006	SK	L

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