

Land south of the A271 and east of the A22,
Lower Horsebridge, Hailsham

Heritage statement addendum

Hertfordshire Holdings Ltd
November 2023

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1.0 Introduction

- 1.1 This report provides an addendum to the desk-based heritage assessment (Terence O'Rourke, November 2022) and considers the reason for refusal 2 that states that development of the Site would result in 'harm to the character of the setting of two adjacent grade II listed buildings (Brook House and the Boship Farm Hotel).'
- 1.2 This report is one of a number accompanying a Statement of Case in the Appeal against refusal by Wealden District Council (WDC) of planning application ref. WD/2022/3222/MAO. It should therefore be read alongside the full set of application drawings and documents.
- 1.3 The baseline information on the historic development of the area and all designated heritage assets within 500 metres of the Appeal Site were included in the original heritage assessment so are not repeated here, but the same numbering does apply for consistency.
- 1.4 The 7.67-hectare (ha) Appeal Site comprises a large, grazed field. The northern and western boundaries are the A371 and the A22 Hailsham bypass, respectively, and the eastern and southern boundaries are formed by the Lower Horsebridge Stream, a tributary of the Cuckmere River. The Site lies to the southwest of Lower Horsebridge village. It is adjacent to the Boship Roundabout and associated development on the A22 at this location including a petrol station and convenience retail store, coffee shop and food on-the-go outlet, Travelodge and hotel (Boship Lions Farm Hotel, LB12).
- 1.5 The application was submitted to WDC in December 2022 and validated on 2 February 2023, following receipt of further information requested by WDC. The planning application was refused by a delegated decision of the planning case officer on 30 June 2023.
- 1.6 In submitting this Appeal, a further amendment has been made to remove all built development to the southeast of Brook House / east of the proposed access road. This judgement was made following our site visit in September 2023 and our conclusion that while it was difficult to mitigate the harm to the setting of Brook House down to zero, or to remove it completely, an alternative less impactful proposal should be put forward that removes new built form opposite the listed building and within its eastern 'green' landscape setting. This change is shown on the revised masterplan layout (figure 3).

2.0 National and local planning policy

- 2.1 National policy recognises the value and significance of cultural heritage, the public interest in the preservation of particular assets and sets out mechanisms to ensure that it is taken into account in planning decision-making. Sites and features of identified interest are protected under the Ancient Monuments and Archaeological Areas Act 1979 as amended, the Planning (Listed Buildings and Conservation Areas) Act 1990 and the Town and Country Planning Act 1990.¹
- 2.2 Section 66(1) of the 1990 LBCA act states that, in considering whether to grant planning permission for development that affects a listed building or its setting, the local planning authority or 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*”.
- 2.3 Since the application was submitted, the NPPF has been updated, and the paragraphs relevant to heritage have been renumbered to now appear as paragraphs 189 to 208 (Department for Levelling Up, Housing and Communities, September 2023).
- 2.4 The statutory development plan comprises the adopted Wealden District Local Plan (February 2013), the saved policies of the adopted Wealden Local Plan 1998, the Affordable Housing Delivery Local Plan (May 2016) and the Hellingly Neighbourhood Plan (February 2021).

¹ TCPA section 58B, added by the Levelling Up and Regeneration Act, 2023.

3.0 Response to the application

Consultation

- 3.1 The Wealden District Council Heritage Officer, 6 April 2023 responded to our submitted heritage statement that supported the planning application on 6 April 2023. In summary they stated that there is harm to heritage assets and that *“where harm is considered to be less than substantial, as is the case here, this harm should be weighed against the public benefits of the proposal and this planning balance is for the planning case officer to consider.”*

Reason for Refusal 2: Listed buildings

- 3.2 WDC identifies that the Appeal Scheme will harm the character of the setting of two grade II listed buildings (Brook House and the Boship Farm Hotel).
- 3.3 The desk-based heritage assessment that was submitted with the original application stated that the proposed development is predicted to result in harm to the significance of the grade II listed Brook House as a result of the changes to the setting of the asset through the loss of part of the open land to the south and its visual prominence in close proximity to the asset. The original assessment concluded that this will be less than substantial harm in terms of NPPF paragraph 202, categorised as a medium level if a spectrum is used.
- 3.4 The desk-based heritage assessment submitted with the original application stated that Boship Farm Hotel, to the west of the Site, is physically and visually separated from the Site by the Boship Roundabout, the A22 road and vegetation. It considered that there is no potential for effects on its significance as a result of the proposed development.
- 3.5 Prior to the determination of the application an amendment was made to the parameters plan to reduce the built area, both in terms of the quantum and the proximity, of development to the southeast of Brook House. In submitting this Appeal, a further amendment has been made to remove all built development to the southeast of Brook House / east of the proposed site entrance access road (see figure 2 parameter plan). The effect of this amendment on the assessment of effects on Brook House and its significance will be described below. Further reasoning as to our judgement on the lack of potential effects on Boship Farm Hotel will also be provided.
- 3.6 Whilst developing the Site would have visual impacts and would reduce the width of the field area that contributes to the setting of Lower Horsebridge, the substantial strategic landscape enclosing the developed area would, as it establishes and grows, provide an attractive woodland edge providing a green setting to Lower Horsebridge, the stream corridor and the wider Cuckmere River corridor.
- 3.7 The substantial green open space to be provided involves more than half of the Site's area and would facilitate high quality landscape planting with multiple benefits in terms of public access, amenity and biodiversity, as well as some mitigation of the visual impact of new built development on the remainder of the Site.

4.0 The setting of the designated heritage assets

- 4.1 The submitted desk-based heritage assessment follows the approach to identifying those heritage assets likely to be affected by a development proposal given in the guidance by Historic England, which states that, *“The setting of a heritage asset is ‘the surroundings in which a heritage asset is experienced’ (NPPF, Annex 2: Glossary). Where that experience is capable of being affected by a proposed development (in any way) then the proposed development can be said to affect the setting of that asset.”* (GPA3, paragraph 20).
- 4.2 Historic England guidance aims for a consistent approach to the assessment of setting and the range of historic, visual and functional relationships that can define the contribution of adjoining land to the significance of any single asset or group of assets. These include physical attributes and perceptual values, depending on the nature of an asset and its past and present surroundings.
- 4.3 The principal significance of the nationally listed buildings in the study area both individually and as a group lies in the historic and architectural interest of the fabric and their obvious time-depth, as examples of the prevalent local vernacular, and the insight they give into the historic settlement pattern and the agricultural history of the area. None are of a status that would imply a particular visual priority or any designed or intentional views.
- 4.4 Two listed buildings are mentioned specifically in the RfR as being harmed as a result of the proposed development: Brook House (LB3 on figure 1) and Boship Farm Hotel (LB12 on figure 1) and the significance of each asset will be described below; noting that there will be no direct physical impact on either building as a consequence of the development proposals, and that any potential effects are entirely with regards to change to their setting.

Brook House, LB3 on figure 1; figure 4 site photographs

- 4.5 This grade II listed building was constructed in c.1830, as a half H-shaped house of two storeys with three windows. The ground floor is of red brick and grey headers, above tile hung with tiled roof, casement windows. The wings have gables with scalloped bargeboards, the ground floor of the centre portion has been filled in later to form a porch.
- 4.6 The setting of Brook House was experienced as one dominated by the constant noise, movement and hazard of oncoming vehicles along the A271. A footpath is present along the eastern side of the carriageway opposite Brook House allowing close appreciation of the architectural form and aesthetic quality of the property, which is set back from the edge of the road by the presence of redbrick boundary wall and close boarded fence. A modern garage building is sited to the south of the building and an additional area of gravel presumably for carparking lies south of the garage to mark the extent of ownership of the property.
- 4.7 The presence of a woodland copse to the south and tall mature trees to the north of the property, as well as the bend in the road to the north, result in containment of views and limit the immediate appreciation/awareness of Brook

House to close quarters on the footpath immediately opposite with no extensive unfolding views experienced for travellers along the A271.

- 4.8 An appreciation of Brook House can be gained from the east-west PROW sited immediately north of the proposals, especially the extent between the A271 and the cut through heading northwards into the Hellingly cricket and rugby pitches (recreation ground). The principal elevation comprises three bays with a recessed central entrance bay faces south over the adjacent A271.
- 4.9 Brook House has no historic or functional links to the development site. It was constructed as a private residence and not a farmhouse connected to the Site for any associated arable or pastoral farm uses. The setting of Brook House is largely derived from its physical and visual relationship adjacent to the A271, as well as its immediate relationship to its private garden plot to the west and north. It is my professional opinion that it is the visual relationship of Brook House to the Site that contributes to some of its significance, primarily as a result of proximity and ability to appreciate the architectural aesthetic of the building.
- 4.10 The Site is currently wide-open pasture devoid of development and the proposed change of use and character as a result of the proposals will result in visual change to the present setting of Brook House. Brook House is currently not sited adjacent to roadside properties so has an isolated and contained aspect, not comparable to more recent late 20th century properties beyond the bend in the A271 to the northeast or the five properties to the south.
- 4.11 Whilst developing the Site would result in visual change and would reduce the width of field area that contributes to the overall rural setting of Lower Horsebridge, the strategic green open space immediately east and opposite Brook House would, as it establishes and grows, provide an attractive woodland edge providing a green setting to Lower Horsebridge, the stream corridor and the wider Cuckmere River corridor. The amended proposals would effectively remove all competing built form from the immediate setting of the designated heritage asset of Brook House and result in a more appropriate green landscape outlook. The amended masterplan would result in a degree of harm by the very nature of development change in the setting, which does contribute positively to the significance of Brook House, but the harm is judged to be at the lower end of less than substantial harm.

Boship Farm Hotel, LB12 on figure 1

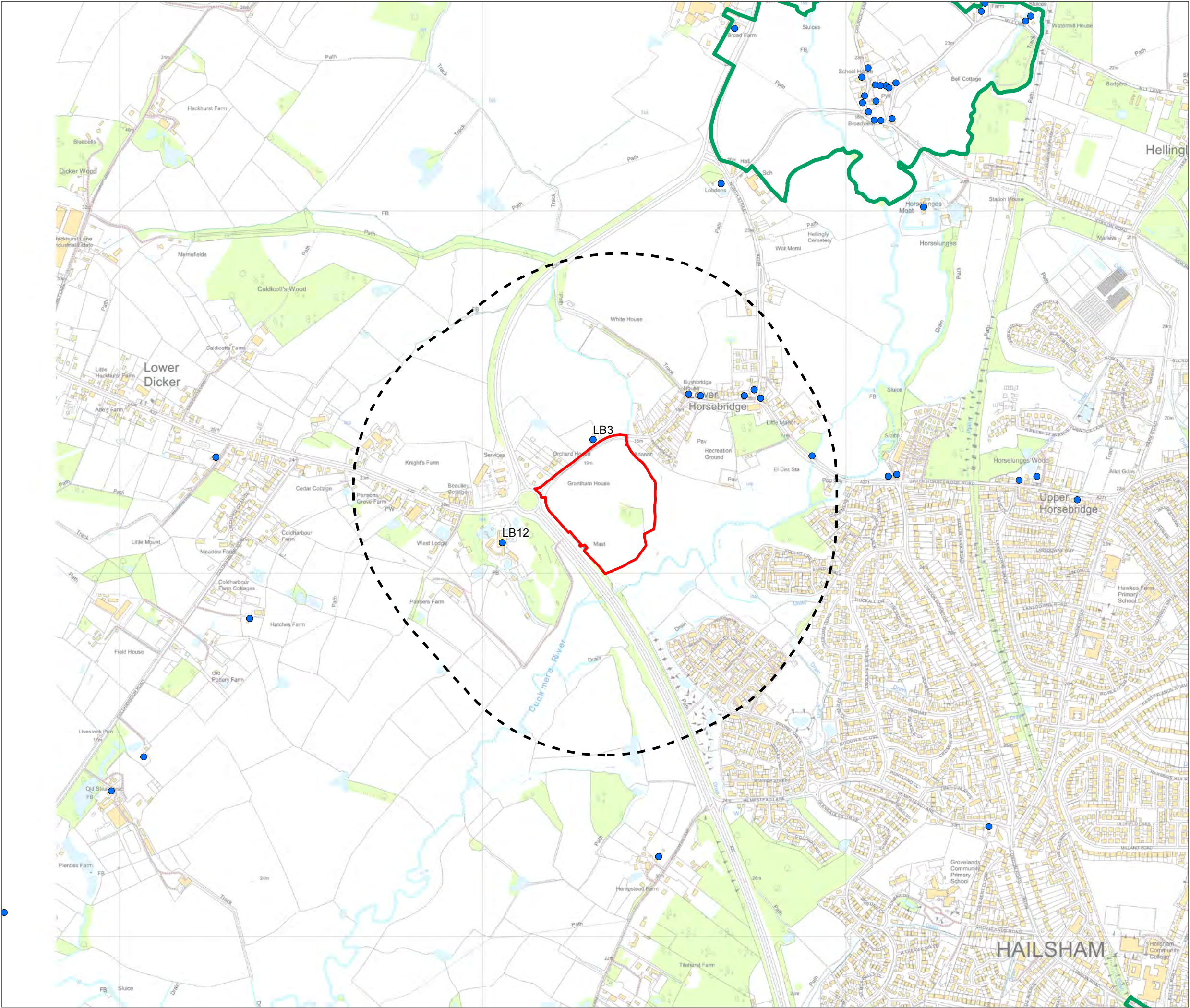
- 4.12 Boship Farm Hotel is a grade II listed building that was originally known as Horeship Farm and was built by M Fuller in 1652. It is a timber-framed building encased in red brick and was altered in the early 19th century. Two storeys, attic with four windows and three gables containing attic windows. Cemented stringcourse and tiled roof. Early C19 windows with rusticated painted surrounds and 2 or triple narrow sashes. Four centred doorways flanked by narrow lights. Brick chimney breast with offsets on east wall.
- 4.13 The setting of Boship Farm Hotel was not experienced during the recent site visit in September 2023 because the property was closed to the public as it had been acquired by the Home Office to house asylum seekers in the region. It

was not possible to park and access the hotel grounds, so the following assessment is based on visual appreciation from the A22 to the north.

- 4.14 Boship Farm Hotel (LB12) is sited c.155-metres west of the site and is physically and visually separated from the site by the Boship Roundabout, A22 Hailsham Bypass and boundary vegetation. The historic Horeship Farm, later named as Boship Farm on the 1875 first edition Ordnance Survey, is much altered and been the subject of numerous listed building consents to convert several associated outbuildings and construct modern extensions to the south to create what is now a 45-bed hotel complex. The hotel is set within extensive grounds that extend to the east up to the A22 and south towards an access track to Palmers Farm. The hotel is situated within an Archaeological Notification Area defining both a medieval moated site and a 17th century farm complex.
- 4.15 Access to the hotel is from the north off A22 which allows visual appreciation of the north-facing façade of the historic farmhouse seen across the extensive circular driveway and parking forecourt. There is no historic or functional link between Boship Farm Hotel and the Site, and the present setting is dominated by either the noisy A22 or its functional role as part of an operational hotel complex with associated extensive landscape within its boundary. The Site plays no role in the appreciation or experience of the setting of this designated heritage asset and there is no potential for effects on the significance as a result of the proposed development.

5.0 Conclusions

- 5.1 The history of the place, in this case a large piece of pastureland close to two roadside properties on the edge of Lower Horsebridge village, and the history of two heritage assets – one a private dwelling and one an operational functional hotel complex – will remain legible following the development judged to fall within a portion of their setting. Their origin, history and architectural qualities will remain appreciable, not only to the educated eye.
- 5.2 Harm is defined as change for the worse, the effect of inappropriate interventions on the heritage interest of a place that reduces their values and recognised significance to society. Change, for example visual change, is not in itself an impact on the significance of a heritage asset. A harmful impact will only occur if the change affects the contribution made by its setting to its overall significance. Change to setting is only of concern in heritage terms if it gives rise to harm to the significance of the asset, i.e., that the significance is in part derived from the asset's current setting. It should not be automatically assumed that visual change constitutes an adverse impact or that more visual change will be a greater impact.
- 5.3 Applying the advice in the NPPG that within these categories “*the extent of the harm may vary and should be clearly articulated*” (Paragraph: 018 Reference ID: 18a-018-20190723), in addition to a narrative description the effects on the significance of an asset can be expressed in terms of a spectrum, such as a moderate level of less than substantial harm, or at the lowest end of less than substantial harm.
- 5.4 In line with the best practice and guidance by Historic England, we have “*Explored ways to maximise enhancement and avoid/minimise harm.*” It is not possible to avoid or mitigate all of the potential harm to the setting of Brook House, but a more sympathetic landscape treatment with the removal of new built form immediately southeast would in our opinion alleviate and adequately reduce the degree of harm. As a consequence of the above amended design changes, we would argue that the degree of harm to this designated heritage asset (the proposals do not in our opinion give rise to any other harmful effects to other designated heritage assets), would be at the lower end of less than substantial harm.
- 5.5 Overall, it is judged that development of the Appeal Site will result in less than substantial harm in terms set out in paragraph 202 of the NPPF and this should be given the appropriate weight and weighed against the public benefits of the proposal.



- Site boundary
- 500m study area
- Listed buildings
- Conservation areas

Land south of the A271 and east of the A22, Lower Horsebridge
Hertfordshire Holdings Ltd

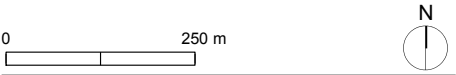
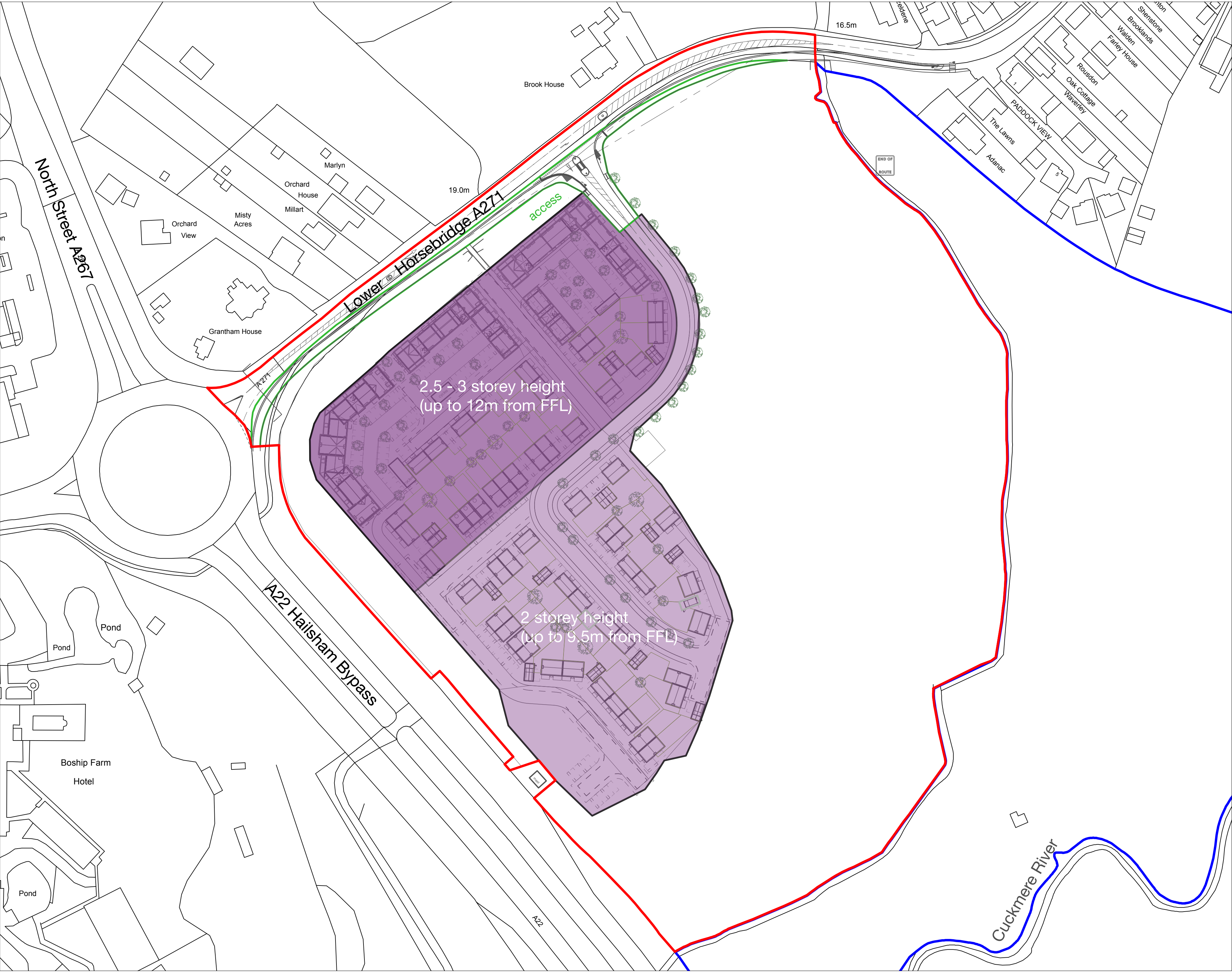


Figure 1 Site location and designated heritage assets within the 500m study area

Dwg no/231703C/H101	Revision
Status	07 December 2023
Scale: 1:10,000 @A3	Drawn by: JC Checked by: SD

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Notes/Revisions			
A	16/05/2023	Revisions to 2.5/3st height parameter	DF
B	31/05/2023	Revised access junction	DF
C	29/09/2023	Development east of entrance removed	DF

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Parameters Plan
Maximum Building Heights & Access

Status: PLANNING		Drawn by: DF	Checked by: TRW
Project Number: 231703C	Scale @ A2: 1:2500	Date: 05/2023	
Drawing Number: TOR-XX-ZZ-DR-A-P011		Revision: C	

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Notes/Revisions		
A	16/05/2023	Revisions to house plots east of entrance, illustrative landscape updated
B	31/05/2023	Access junction updated
C	29/09/2023	Development east of entrance removed for landscape enhancement

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Illustrative Masterplan

Status: PLANNING		Drawn by: DF	Checked by: TRW
Project Number: 231703C	Scale @ A2: 1:2500	Date: 05/2023	
Drawing Number: TOR-XX-ZZ-DR-A-P010		Revision: C	

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1. View at the edge of Lower Horsebridge on Upper Horsebridge Road/ A271



2. Brook House (LB3)



3. View looking west from the north side of the site



4. Boship Farm Hotel (LB12)