
From: Heather Hall
Sent: 06 April 2023 14:44
To: Claire Turner
Cc: planning
Subject: WD/2022/3222/MAO - Land S of A271 and E of A22, Lower Horsebridge, Hailsham BN27 4DN

Categories: Consultee

Dear Claire,

Please accept this email as my formal consultation response on the above outline major application at Land south of the A271 and east of the A22, Lower Horsebridge.

Heritage considerations

The Council has a duty to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses (Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990) (thereafter referred to as The Act).

The requirements of The Act are reinforced by the National Planning Policy Framework 2021 (NPPF), which at Chapter 16, sets the national agenda for 'Conserving and enhancing the historic environment'. This, in particular, requires the significance of any heritage asset to be identified and assessed that may be affected by a proposal (including by development affecting the setting of a heritage asset) and for this to inform future change in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. Paragraph 200 of the NPPF states that significance of a designated heritage asset can be harmed or lost through alteration or destruction of the heritage asset or through development within its setting. Paragraph 189 of the NPPF states that planning should conserve heritage assets in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of this and future generations.

It should be noted that the Courts have held that 'preserve' means an absence of harm. The NPPF points out that harm can be either 'substantial' or 'less than substantial' and where harm occurs, it should be given considerable weight as a material consideration in the assessment of planning applications and as part of the balance exercise and in ascertaining if any public benefits would outweigh that harm. This national policy intent is addressed by 'saved' Local Plan Policies EN1 and EN27; Core Strategy Policy SP02; as well as Chapter 12 of the Wealden Design Guide.

Considerations of the proposals

The heritage issue for consideration is the impact of the proposed development on the significance of nearby heritage assets, through development within their settings. The NPPF at paragraph 199 states that great weight should be given to the conservation of designated heritage assets through an understanding of the impact of a proposed development on their significance, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

I generally agree with the Heritage Assessment's analysis that the site contributes positively to the significance of Brook House through its setting, and that there would be impacts amounting to a medium level of less than substantial harm from the proposed development. The impacts could be reduced modestly by removal of the houses on the eastern side of the new access and more

generally through use of more traditional forms of development 'fronting' the A271, rather than the large blocks shown on the illustrative plans.

Despite the intervening road infrastructure, such large (3-storey) blocks and this more urban form of development could, in my view, also present harm within the setting of Boship Farm Hotel through further erosion of the rural character of its surroundings and impact on the broader dispersed historic settlement pattern on the edge of Lower Horsebridge. The site forms part of the experience in terms of its contribution to the character and grain of the setting, and thereby affords some appreciation of the asset's significance.

I understand that the submitted site layout is indicative at this stage, however, I do have concerns that the layout as shown on the illustrative masterplan would not lead to the site being read as a sympathetic development within the setting of these heritage assets. The scale and shape of development would be in sharp contrast to the surviving rural qualities of the area which presently characterises the setting of the assets. As such, it is difficult to see how the quantum of development proposed might be achieved without the higher density elements in the north-west corner of the site, in a manner which would avoid or minimise harm to the significance of the heritage assets.

In summary, the NPPF recognises that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance. Great weight should be given to the conservation of designated heritage assets, including any harm or loss of significance through development within their setting. The NPPF also places great importance on development being of good design and responding to local character to ensure the integration of new development into the existing environment (paragraph 130); and specifically encourages local planning authorities to look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance (paragraph 206). Chapters 5 and 7 of the Wealden Design Guide also encourage high-quality, contextual design. 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.

**Heather Hall | BArch, Msc Historic Building Conservation, IHBC
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