

Appeal Ref: APP/C1435/W/23/3335625
LPA Ref: WD/2022/3222/MAO

**Land South of the A271 and east of
the A22, Lower Horsebridge,
Hailsham, East Sussex BN27 4DN**

Summary of Heritage Proof of Evidence

For the appellant: Hertfordshire Holdings
Ltd

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1. Introduction

- 1.1. My name is James Weir and I am the Technical Director for heritage at tor&co (formerly Terence O'Rourke), where I lead and manage the built heritage and archaeology team.
- 1.2. I hold a doctorate (DPhil) in Architectural History from Kellogg College, University of Oxford, and an MA in Literae Humaniores from Somerville College, University of Oxford. I also hold a Postgraduate Certificate in Architectural History from the University of Oxford Department for Continuing Education and a Postgraduate Diploma in Surveying from the College of Estate Management.
- 1.3. I am full member of the Institute of Historic Building Conservation (IHBC), which I have held since 2010, and am a Fellow of the Royal Society of Arts.
- 1.4. Further details of my background and experience are set out in my main Proof of Evidence.
- 1.5. Having joined tor&co in January 2023, I have not been involved in any earlier stages of the project, including the production of the DBHA or the DBHA Addendum.
- 1.6. The evidence which I have prepared and provided for this appeal is given in accordance with the professional standards and Code of Conduct of the Institute of Historic Building Conservation [IHBC] and I confirm that the opinions expressed are my true and professional opinions.
- 1.7. I undertook a site visit on Tuesday 6 February 2024, during which I accessed the site and surrounding area on foot.

2. Scope of evidence

- 2.1. My evidence deals with the two heritage issues which are between the parties:
 1. the scale of harm to the significance of Brook House within the less than substantial harm category; and
 2. the assessment of harm (at any category and scale) to the significance of the Boship Farm Hotel.
- 2.2. Neither of these assets is directly affected by the proposals and so the assessments are to do with impacts arising from the development on the contribution of setting to these assets' significance.
- 2.3. Regarding Brook House, the appellant's position is that there is less than substantial harm to its significance through development in its setting, but that the nature and extent of harm is low. Wealden DC's position is that the harm is still less than substantial, but at a 'medium' level within the category.
- 2.4. Regarding the Boship Farm Hotel, the appellant's position is that the proposed development will result in no harm to its significance through development in

its setting. Wealden DC's position is that there is less than substantial harm, at a low level, to the significance of this asset arising from the proposals.

- 2.5. The assessment proceeds in a methodical manner, beginning with an overview of the significance of these assets according to their archaeological, architectural and/or historic interest. This provides a baseline for the subsequent assessment of the contribution of the current setting of the assets to any of these interests, then the impact of the proposed development on the contribution of the setting, and therefore to the significance of the assets.
- 2.6. My assessment takes into account cumulative change and the need for local planning authorities to take this into consideration where incremental changes to the setting of an asset can have a negative effect on significance. However, I note that cumulative change is not a 'last resort' for a sudden assessment of a high, or higher, degree of harm, with none having been found on preceding incremental schemes. It is rather an assessment of whether the extent of change has already negated the contribution of one or more aspects of an asset's significance, which in turn affects the assessment of harm.
- 2.7. No other listed buildings are identified by Wealden DC as having any impact on their significance and it is therefore reflected in the Statement of Common Ground that the significance of no other heritage assets is affected by the proposals.

3. The significance of affected heritage assets

- 3.1. This section assesses the significance of each of the assets according to their archaeological, architectural and/or historic interest, utilising the interests as set out for significance in the Planning Practice Guidance and using a simple scale of 'low', 'medium' and 'high'. This scale does not supersede an acknowledged special interest inherent in the statutory listing of the assets.
- 3.2. In assessing significance, I utilised a number of documents from the original application and my site visit. In addition, I used the assessments put forward in the heritage statement and officer recommendation from the recent application at Knight's Farm, located to the north of Brook House (WD/2023/2100/DC), which were accepted without criticism by Wealden DC.
- 3.3. It should be noted that the assessments of significance are provided without having had internal access to the buildings or full access to the curtilage of the affected assets.
- 3.4. The assessment of significance is the baseline against which the contribution of setting can be understood. Setting contributes to significance when it permits an understanding and appreciation of one or more identified elements of significance of a heritage asset.

Brook House

Archaeological interest

- 3.5. It is possible that Brook House, constructed in c. 1830, occupies the site of an earlier dwelling shown on historic maps, or incorporates earlier fabric relating

to it.

- 3.6. Given the legible historic settlement pattern, it is likely that any earlier building was 18th-century in date and formed in a landscape of piecemeal assarts from woodland, which had probably been ongoing since the early medieval period.
- 3.7. I consider the archaeological interest of the asset to be low, which corresponds with the assessment in the heritage statement and officer's recommendation for the Knight's Farm scheme.

Architectural interest

- 3.8. The building is a good example of a 19th-century polite rural villa in a half H-shape, which would be relatively unusual for the period, but has external decorative features which suggest later 19th-century amendments.
- 3.9. The building's interest lies predominantly in its 'elegant principal façade', combined with its formality, scale, and material palette.
- 3.10. I consider the architectural interest of the asset to be moderate, an assessment which again agreed with the Knight's Farm heritage statement and officer recommendation.

Historic interest

- 3.11. The asset has no known direct or tangible links to notable historical events, movements, groups or individuals. It also has no communal value, having always been a private dwelling. These findings agree with those in the Knight's Farm heritage statement.
- 3.12. The building has illustrative interest owing to its ability to illustrate its original use and purpose as an early Victorian villa, though this is limited to some extent by subsequent changes and alterations.
- 3.13. The building also retains an ability to illustrate the historic dispersed settlement pattern along a former primary thoroughfare into Hailsham through subdivision of a pre-existing larger field parcel.
- 3.14. Taking the assessment into account, I consider the historic interest of the asset to be low, which again concurs with the assessments in the Knight's Farm heritage statement and officer's recommendation.

Summary of significance

- 3.15. The significance of Brook House is therefore considered to be primarily derived from its architectural interest, which is moderate, rather than its historic or archaeological interest, which are both low. Therefore, aspects of setting which contribute to architectural interest, as well as any negative impacts on them, must reasonably be of greater sensitivity and import than those contributing to historic or archaeological interest.

Boship Farm Hotel

Archaeological interest

- 3.16. There is circumstantial evidence that the site of the Boship Farm Hotel has been occupied since the medieval period, with the current building possibly being preceded by a moated site.
- 3.17. On that basis, it is likely that the current building contains evidence relating to an earlier building or building phase, whether within the surviving fabric or below ground.
- 3.18. I therefore consider the building to have **high** archaeological interest.

Architectural interest

- 3.19. The building's interest lies primarily in its external form, especially the prominent three-gabled frontage and associated 17th-century features, such as mullioned windows, though interest may also derive from any surviving internal timber framing.
- 3.20. The asset has been altered to an extent which does diminish the form of the original building, predominantly through the sprawling rear and side extensions. It is also likely that there has been considerable change to the internal areas, owing to its long use as a hotel.
- 3.21. On the above basis, and taking into account the external changes and the likely internal changes associated with modern hotel use over a long period, I would assess the architectural interest of the building as moderate.

Historic interest

- 3.22. Assuming a correct identification of the builder/renovator as 'M Fuller', the building has a likely historical association with the Fuller family, who had had ironworking interests in Heathfield since the 17th century. Presumably this would be a branch of the Fullers who had been tenants at Tanners Manor, Waldron, since the early 16th century.
- 3.23. The connection seems cemented by the 19th-century record of the landowner as Augustus Elliott Fuller (1777-1857), who certainly was related to the iron-working Fullers. However, there is no evidence to suggest that Augustus Fuller ever lived at Boship Farm, as he was resident at Ashdown House.
- 3.24. The building's ability to illustrate its original use has been significantly eroded by the expansion of the site with the accoutrements of hotel use to the point that the site retains little communicable trace of agricultural usage.
- 3.25. It has a vestigial historic spatial and functional relationship with two farm buildings, both probably early 19th-century, but this has been diminished by their subsumption into the building through numerous extensions.
- 3.26. The building retains some historic interest owing to its ability to understand medieval settlement across the locality. If it were a moated site, it would sit in a legible context with other surviving moated sites in the area, such as Horselunges Manor and Michelham Priory.

- 3.27. Taking the above into account, my assessment is that the Boship Farm Hotel has **moderate** historic interest.

Summary of significance

- 3.28. The significance of the Boship Farm Hotel is therefore primarily derived from its high archaeological interest, followed by its architectural and historic interests, which are both moderate.

4. Setting assessment steps 1-2: the contribution of setting to significance

- 4.1. Step 1 has already been completed through identifying the affected assets as Brook House and the Boship Farm Hotel. No other heritage assets are affected by the proposals.
- 4.2. Step 2 assesses how the current setting of the assets contributes to understanding or appreciating the interests outlined in the assessment of significance.
- 4.3. In this section I also draw on the assessments made in the Knight's Farm application, in particular the heritage statement and the officer's recommendation.
- 4.4. I also take into account Wealden DC's *de facto* long-term view of growth in the Boship area, arising not only from their Knight's Farm proposals, but also the large strategic employment allocation to the north of the services which is included in the draft local plan.

Brook House

- 4.5. The application documentation for Knight's Farm identifies that the 'historic setting [of Brook House] has been eroded through modern development since the 1950s'. However, this observation does not seem to be repeated in Wealden DC's approach to this application and appeal, being absent from the heritage officer's consultation response, the officer's recommendation, the decision notice and the Statement of Case.
- 4.6. I submit that the 'clear and apparent change to the wider rural character of the area' – noted in the context of Wealden DC's own application at Knight's Farm – also applies to the appeal site.
- 4.7. The principal element of the current setting which contributes to the asset's moderate architectural interest is the view from the A271, with lesser contributions from the view from the public right of way and the building's interrelationship with other buildings, planting and boundary features within its curtilage.
- 4.8. The principal elements of the current setting which contribute to the asset's low historic interest are: i) the view from the asset over the field to the south (which includes the appeal site); ii) the vestigial undeveloped land within that view (which includes the appeal site), and iii) the view from the A271 and

public right of way. Owing to the 'erosion' of the area already acknowledged, the contribution of these elements to historic interest is low.

- 4.9. I have not identified any elements of setting which contribute to the asset's archaeological interest.

Boship Farm Hotel

- 4.10. The site has undergone such extensive change in modern times that the legibility of the relationship between the house and historic farm buildings is significantly curtailed, yet remnant.
- 4.11. The external grounds of the farm have also taken on more of the legibility of an extended modern hotel complex, than post-medieval farmstead or centre of a historic agricultural estate.
- 4.12. The factors of 'erosion', which Wealden DC posited in their Knight's Farm application for the Brook House environs, also apply to the Boship Farm Hotel. In that application, the Council accepted the separating nature of the main routeways when considering setting of heritage assets, but notably took a different view in this application.
- 4.13. The combination of the long-term 'erosion' of the rural character of the area and the major dual carriageway jointly divorces the appeal site from any intelligible or experiential connection with the asset. Therefore, there is no 'countryside setting' to the north and east of the asset which contribute to its significance.
- 4.14. The principal element of the current setting which contributes to the asset's high archaeological interest is the undeveloped areas around the hotel buildings, owing to their potential for remains relating to earlier (medieval) uses of the site.
- 4.15. The principal elements of the current setting which contribute to the asset's moderate architectural interest are the views of the building from within the hotel curtilage, followed by a moderate contribution of the views from the A22 and a low contribution of the view from the A267, from both of which the prominent frontage is perceptible to a greater or lesser extent.
- 4.16. The principal element of the current setting which contribute to the asset's moderate historic interest is the moderate contribution of the undeveloped landscape to the south and southwest and the low contribution of views from within the curtilage.

5. Setting assessment step 3: impacts on contribution to significance

- 5.1. The impact assessment is based on the revised illustrative masterplan and parameters plan that were drawn up after the refusal of the application and before submission of the appeal.

Brook House

Contributory to architectural interest

- 5.2. There is no impact on the highest contributor of setting to significance, the frontal and oblique view of the front of the building from the A271, whose contribution is moderate.
- 5.3. Though part of the proposed development would be co-visible in oblique views from the east, this would be peripheral and not obstruct or hinder the said views. There would therefore be no diminishment of the view to communicate the asset's architectural interest. Similarly, no impact on the frontal or oblique views from the west (which are short) would result owing to the position of the site behind the viewer.
- 5.4. There is no impact on the lesser (low) contributory view from the public right of way, where the development would also be a peripheral element in this more distant view of the front elevation. Again, the view of the building would not be obstructed or hindered and so the ability of the view to convey an appreciation of the building's frontage would be preserved.
- 5.5. There is no impact on the interrelationships between the house and its curtilage buildings, planting and boundaries.
- 5.6. Taking the above into account, there is therefore no detrimental impact on the contribution of setting to the asset's architectural interest.

Contributory to historic interest

- 5.7. The development will be visible in the contributory view from Brook House over the land to the south, which includes the appeal site, resulting in a partial closure of what is currently a wide view over undeveloped land.
- 5.8. This view plays some part in communicating a vestigial sense of the historic isolation and dispersed settlement pattern of the area, but this is low owing to the aforementioned 'erosion' of the rural character of the area. Therefore, I consider the detrimental impact on this view to be low.
- 5.9. The contribution of the view from the public right of way is low, owing to the 'erosion' of the rurality of the area and the experiential influence of the sight and sound of modern transport infrastructure within the view, which combine to diminish the sense of isolation and dispersion. The impact on this view is therefore low.
- 5.10. There is no impact on the low contribution of the view from the A271 for the reasons given above in relation to architectural interest.
- 5.11. The development will have a negative impact on the contribution of setting to historic interest owing to a low impact on the southward view from Brook House and the partial, yet cumulative, loss of remnant undeveloped land in the setting.
- 5.12. Taking into account the low extent to which these elements contribute to significance, and the low contribution of historic interest to significance itself, the overall impact is considered to be low; consistent with a 'low end' of less

than substantial harm.

Boship Farm Hotel

Contributory to archaeological interest

- 5.13. There are no impacts on this contribution owing to the distance between the suite and the curtilage of the asset.

Contributory to architectural interest

- 5.14. Due to the location of the proposed development, there is no harm on the high contribution of views from within the asset's curtilage.
- 5.15. The proposed development will be co-visible with the asset in moderately contributory view from the west along the A22, but it will be a distant element and will not obstruct or hinder the view of the building's frontage.
- 5.16. The same applies to the southward view of the frontage from the A267, which in any case is a low contributor owing to foreground distractions and the ever-present traffic.
- 5.17. There are therefore no negative impacts on the contribution of setting to the asset's architectural interest.

Contributory to historic interest

- 5.18. There are no impacts on the moderate contribution of the undeveloped landscape to the south and southwest of the asset, owing to the site's location.
- 5.19. For the same reason as was given for architectural interest above, there are no impacts on the contribution of views from within the curtilage on historic interest.

Summary of impacts

- 5.20. The above assessment results in the following conclusions regarding harm to significance of designated heritage assets through development affecting their setting:

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|---------------------|---|
| • Brook House | less than substantial harm (low extent) |
| • Boship Farm Hotel | no harm |

6. Setting assessment step 4: maximising enhancement and avoiding or minimising harm

- 6.1. The proposals under consideration represent the second revision to the scheme.
- 6.2. Amendments were made partly to address the concerns of the heritage officer, who had advised that 'impacts [on Brook House] could be modestly reduced by removal of the houses on the eastern side of the new access', which was duly undertaken.

- 6.3. The removal of houses from the eastern side of the access successfully resulted in a reduction of the extent of harm to Brook House.
- 6.4. The assessment has shown that it is the further erosion of an undeveloped space that results in the harm to significance. Therefore, it is unlikely that harm could be avoided entirely by any extent of development on the site.
- 6.5. Extensive reductions in quantum are not always possible where development seeks to deliver public benefits in other areas of the planning balance.
- 6.6. The application is in outline, with all matters reserved except access and therefore offers opportunities for detailed design at reserved matters stage, such as landscaping, screening, layout and suitable choice of building scale.

7. Conclusion

- 7.1. My assessment has demonstrated the value in a detailed and methodical approach to assessing the contribution and impacts on setting, by building up layers of knowledge.
- 7.2. The assessment benefitted from many agreed points arising from the assessment of the significance (including the contribution made by setting) of Brook House in Wealden DC's Knight's Farm application.
- 7.3. The assessment also identified some apparent discrepancies in the approach taken by Wealden DC in their Knight's Farm application and this appeal, especially the separating function of major roads and the 'eroded rural character' of the area.
- 7.4. I found the impact on Brook House to be less than substantial harm, with the harm articulated in detail as being in low in nature and extent.
- 7.5. I found that there are no impacts on the significance of the Boship Farm Hotel, including any contribution made by its setting.