



Historic England

Mr James Neave
West Sussex County Council
Planning Business Unit, 2nd Floor
Northleigh, County Hall
CHICHESTER
West Sussex
PO19 1RH

Direct Dial: 0207 973 3637

Our ref: P01172410

24 February 2020

Dear Mr Neave

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**EVERGREEN FARM, WEST HOATHLY ROAD, EAST GRINSTEAD, RH19 4NE
Application No. WSCC/004/20**

Thank you for your letter of 4 February 2020 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Standen House is a nationally significant Arts and Crafts house built in 1892-94 by Philip Webb, who was a close friend and collaborator of William Morris. It lies within its Grade II garden, which is divided into formal and informal areas, with its estate beyond. The house is of great importance as an excellent example of a country house in the arts and crafts style; its garden wrapping around it with views out towards the wider Wealden countryside. It is approached by a small lane which originally led to the farmhouse which pre-dates and adjoins the house. The lane was intentionally used by Webb to create a main approach to the house which enhances its rural character and setting. This tranquil and bucolic approach is still appreciable at present and contributes to the visitor experience of arriving at Standen.

It is proposed to restore the former landfill site at Evergreen Farm with a landfill cap system. A high risk for health has been identified due to gas and groundwater leachate emissions to controlled waters, as well as exposed obstructions maiming livestock. The site has also suffered from differential settlement. The addition of a landfill cap would require the importation of soils for 80 weeks, with approximately 35 deliveries per day to create a 1-1.1m clay cover followed by a soil restoration layer. Full restoration would take two to two and half years.

To access the former landfill, HGVs would need to access the main road from the narrow lane which leads to Standen. This lane forms part of the registered park and



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garden and is the only entrance for visitors to Standen. Standen is a popular National Trust attraction and is open year round with average visitor numbers ranging from 450 on weekdays to over 900 at weekends. It is valued by many visitors for the beauty and tranquillity of both of its house and garden, as well as its associations with the Arts and Crafts movement. Part of this is derived from its wider landscape setting of rolling countryside and rock outcrops in which the house is nestled. This is appreciable from the beginning of the approach to Standen off West Hoathly Lane.

A previous application for a landfill cap system on this site was withdrawn in 2019. The National Trust objected to the application and raised concerns regarding, amongst others, the impact of the HGVs and capping on the tranquillity and visitor experience at Standen; impeded access to Standen for visitors; and the economic impact of the proposal on Standen. Their letter states that it would cost the National Trust approximately £1.25million in lost income due to a decrease in visitor numbers by 20-30%, this would have financial implications on the conservation work at Standen.

The National Planning Policy Framework 2019 (NPPF) sets out that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance, so they can be enjoyed for their contribution to the quality of life of existing and future generations (paragraph 184).

Local authorities should take into account the significance of a heritage asset when considering the impact of a proposal, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal (paragraph 190). 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 (and the more important the asset, the greater that 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 193). Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should require clear and convincing justification (paragraph 194). Where a development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (paragraph 196).

We also draw your attention to the Planning Practice Guidance paragraph 013 Reference ID: 18a-013-20190723, which states that 'when assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.'

In reaching a decision on this proposal, your Council will first need to consider whether



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harm to heritage significance has been avoided or minimised, as described above, and only after that has been done, weigh the public benefits against the harm to heritage significance. Additionally, relevant PPG paragraphs, as detailed above, will need to be taken into consideration.

Historic England has concerns regarding the proposals on heritage grounds. We think that 80 weeks of HGV movements across the narrow lane leading to Standen would cause some harm to the significance of the Grade I house and to the Grade II RPG by detracting from the tranquillity and beauty of the setting of the house, particularly along the visitor approach down the lane. We assess the level of harm to be less than substantial. However, our greatest concern is the potential impact of the development on the economic viability of Standen and thus also on its future conservation as noted in the National Trust's letter dated 13 September 2019 for a previous and similar application.. We urge your Council to explore this issue in greater detail in order to understand the full range of impacts to Standen before reaching a decision on this proposal. If your Council is satisfied that the development would have an economic impact on Standen and thus also on its long-term conservation but you are nonetheless minded to approve this application then we recommend you explore how this impact might be mitigated perhaps by a condition limiting vehicle movements or by a financial contribution to offset the loss of earnings to the property. In reaching a decision on this proposal you must also be satisfied that the harm has been minimised, and that remaining harm has clear and convincing justification before weighing the harm against the public benefits.

Recommendation

Historic England has concerns regarding the application on heritage grounds and would be pleased to discuss these further if helpful.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 190, 194 and 196 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.



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Yours sincerely

Isabelle Ryan

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Assistant Inspector of Historic Buildings and Areas

E-mail: isabelle.ryan@historicengland.org.uk



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