

Heritage Impact Assessment

Land at Rudgwick,
Guildford Road,
Rudgwick

July 2025 | Project Ref 5062C



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1. Introduction

1.1 This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Welbeck Strategic Land IV LLP and relates to an outline application for the residential development of land to the north of Guilford Road, Rudgwick. Horsham District Council (HDC hereafter) are the determining authority.

1.2 The application site is an irregular plot of undeveloped pasture land located to the north of Guildford Road, Rudgwick. There are no heritage assets (either designated or non-designated) on the application site but there are a number of listed buildings in the vicinity of the site.

1.3 In accordance with the requirements of Paragraph 207 of the National Planning Policy Framework (NPPF, December 2024) this statement describes the significance of the identified heritage assets.

The Proposals and Relevant Background

1.4 As identified above, the proposed development concerns an outline application for the erection of up to 90 residential dwellings on the application site with all matters except access reserved. The proposed dwellings would include 40% affordable housing. The development comprises:

- A residential area split into three main development blocks separated by new open spaces and green corridors.
- A network of open spaces which includes green corridors, play areas and SuDS features.
- Building heights within the development will be limited to two storeys with a small element of 2.5 storeys at the centre of the site.

1.5 The site has previously been promoted through the local plan process for allocation as site RD1 for 60 units (referenced as "at least 66 homes" when taken in conjunction with 6 units at site RD2) . However, previous pre-application discussions (LPA ref: PE/21/0224) for a larger scheme of up to 105 units was

received in a broadly positive manner from HDC officers at the time of their response in 2022. With regards to heritage matters as part of the pre-application stage, officers noted:

There are several listed buildings nearby the site. The Council's Conservation Officer has commented that the proposed development of this site will lead to change within the settings of these listed buildings. However, these listed buildings are experienced within a village setting. He has commented the development should be designed to reinforce the character of a Sussex village then the impact will not be harmful from a heritage perspective. He has further clarified that the important matter is to design the layout to create a pleasant place following the principles of garden suburb design.

1.6 Following the receipt of this advice, providing an appropriate layout and design which reinforces the character of the village, and avoid harm to significance, has been a primary consideration of the design development process.

Heritage Assets

1.7 There are a number of designated heritage assets in the area surrounding the Site. Through the application of professional judgement, and following a site visit, those most capable of being affected are:

1. Goblin's Pool Hotel (grade II, UID: 1026992)
2. The Queen's Head Public House (grade II, UID: 1026991)
3. The Fox Inn (grade II, UID: 1354189)
4. Old Cottage (grade II, UID: 1285580)
5. Field Cottage (grade II, UID: 1026973)

1.8 A review of the baseline confirms that there are no other heritage assets, designated or otherwise, capable of being affected by the site's redevelopment. This includes the Rudgwick Conservation Area (located to the north of the Site at some distance) and a series of other listed buildings located along Guildford Street, namely Burnalls (grade II, 1026990), Bucks Green Cottage (grade II, UID: 1026989), Bucks Green Place (grade II, UID: 1354188) and Forge Cottage (grade

II, UID: 1026993). While in relatively close proximity to the site, these buildings are already appreciated in a context of (often modern) residential built form which form a boundary between the assets and the site. As such, these assets have been scoped out of this assessment.

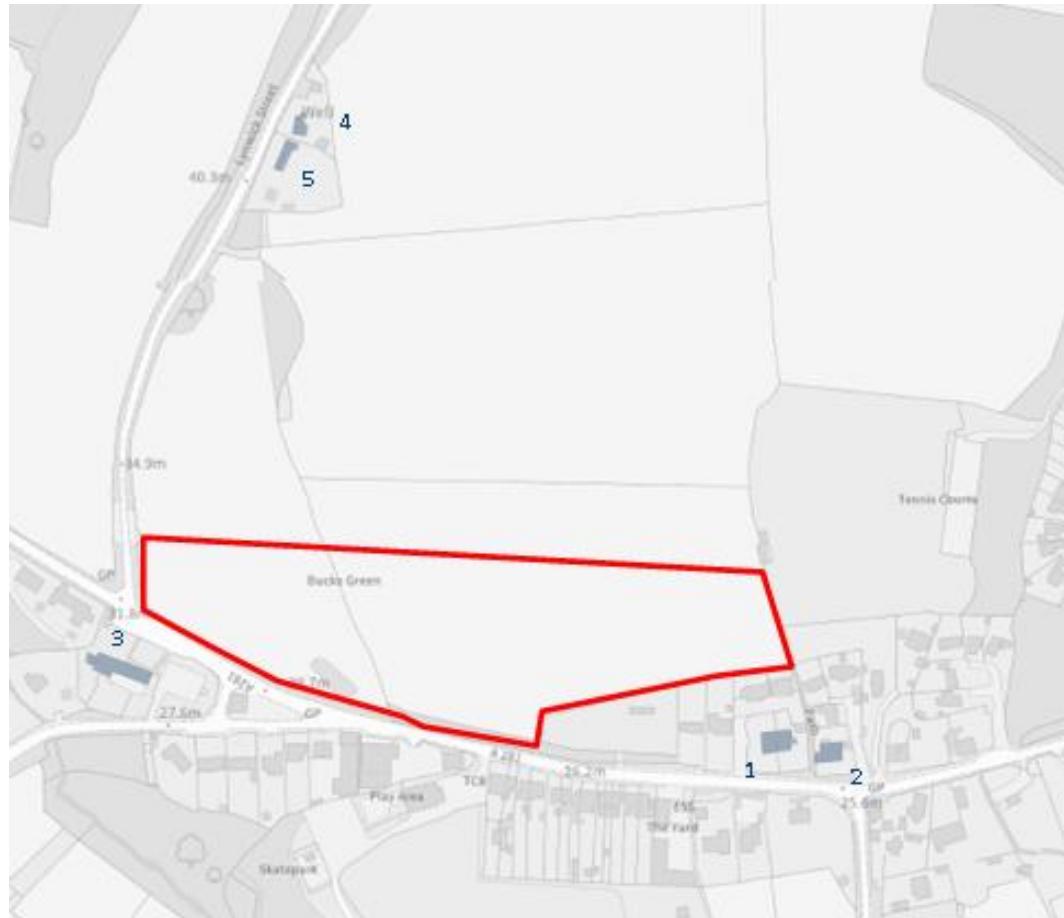


Figure 1: Site location map showing the location of listed buildings

1.9

Overall, proposals have been based on a thorough understanding of the significance and setting of the identified heritage assets and seek to provide a high quality residential development on the site while seeking to preserve their unique heritage values.

Purpose of this Assessment

1.10 The purpose of this Heritage Impact Assessment is to assist with the determination of the application by informing the decision takers on the effects of the proposed development on the historic built environment. Value judgements on the significance of the identified heritage assets is presented and the effects of the proposals upon that significance are appraised. Particular regard is given to the provisions of the Planning (Listed Building and Conservation Areas) Act, 1990. The report also sets out how the proposal complies with the guidance and policy of the NPPF (December 2024) and local planning policy. The site and heritage assets affected have been observed and assessed following a site visit made by the author in September 2024.

2. Relevant Planning Policy Framework

2.1 The decision maker is required by section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.¹

2.2 Measures being implemented as a consequence of the Levelling Up and Regeneration Act 2024 will have the effect of making the desirability of preserving or enhancing other types of designated heritage asset a statutory consideration.

2.3 For the purposes of this statement, preservation equates to an absence of harm.² Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.³

2.4 The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.

2.5 The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

² South Lakeland v SSE [1992] 2 AC 141.

³ Conservation Principles, 2008, paragraph 84.

2.6 Historic England has produced guidance on development affecting the setting of heritage assets in The Setting of Heritage Assets (second edition, December 2017), better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.

2.7 The NPPF requires the impact on the significance of a designated heritage asset⁴ to be considered in terms of either "substantial harm" or "less than substantial harm" as described within paragraphs 214 and 215 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁵ The Scale of Harm is tabulated at **Appendix 1**.

2.8 Paragraphs 214 and 215 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁶ Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 214 and 215 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

2.9 Paragraphs 212 and 213 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that

⁴ The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

⁵ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁶ The balancing exercise was the subject of discussion in City and Country Bramshill v CCSLG and others [2021] EWCA, Civ 320.

affect its significance, irrespective of how substantial or otherwise that harm might be.

2.10 One of the overarching objectives of sustainable development, as expressed in paragraph 8 of the NPPF, is mitigating and adapting to climate change, including moving to a low carbon economy. Historic England has a Climate Change Strategy, and has published Mitigation, Adaptation and Energy Measures. More specifically, Historic England has published a Heritage and Climate Change Carbon Reduction Plan (March 2022). These and similar strategies run in parallel with heritage-specific methodologies relating to the assessment of significance, and the effect of change on significance.

2.11 Relevant local planning policy is contained within the Horsham District Planning Framework (2015) and the Rudgwick Neighbourhood Plan (2021).

2.12 **Policy 34 Cultural and Heritage Assets:** This policy notes that applications for development affecting heritage assets will be required to:

- 1. Make reference to the significance of the asset, including drawing from research and documentation such as the West Sussex Historic Environment Record;*
- 2. Reflect the current best practice guidance produced by English Heritage and Conservation Area Character Statements;*
- 3. Reinforce the special character of the district's historic environment through appropriate siting, scale, form and design; including the use of traditional materials and techniques;*
- 4. Make a positive contribution to the character and distinctiveness of the area, and ensuring that development in conservation areas is consistent with the special character of those areas;*
- 5. Preserve, and ensure clear legibility of, locally distinctive vernacular building forms and their settings, features, fabric and materials;*
- 6. Secure the viable and sustainable future of heritage assets through continued preservation by uses that are consistent with the significance of the heritage asset;*

7. Retain and improves the setting of heritage assets, including views, public rights of way, trees and landscape features, including historic public realm features; and

8. Ensure appropriate archaeological research, investigation, recording and reporting of both above and below-ground archaeology, and retention where required, with any assessment provided as appropriate.

2.13 While not yet adopted, the new local plan for HDC is at an advanced stage and is a material consideration in planning decisions though the weight attributed to it is limited to moderate, in accordance with the NPPF. Relevant policies within that document include:

- **Strategic Policy HA14 Rudgwick and Bucks Green Housing allocation** whereby the site is proposed to be allocated for the provision of at least 60 homes. The draft policy specifically notes that proposals should ensure that appropriate regard is had to the impact on nearby grade II listed buildings.
- **Policy 21 Heritage assets and Managing Change within the Historic Environment** this policy notes that the council will preserve and enhance its historic environment through positive management of assets and their settings. It goes on to provide a list of criteria that development should meet to be supported. Parts 3 and 4 of the policy go on to provide compliance with regards to paragraphs 207 and 208 of the NPPF.

3. Background and Development

3.1

The first map to clearly show the application site is the 1840 Rudgwick Tithe Map (**Figure 2**). This shows the site separated in a series of fields with the general arrangement of surrounding roads being consistent with those present today.



Figure 2: 1840 Rudgwick Tithe Map

3.2

To the western edge of the site, there does appear to be a single property just outside of the site boundary. The associated Tithe Apportionment indicates that this plot (Plot 1123) was owned by Rudgwick Parish with occupiers being Henry and John Woodhatch and the plot listed as 'almshouse and garden'.

3.3

The Tithe Apportionment also indicates that the separate fields were exclusively owned and occupied by John Allberry. John Allberry is also listed as the landowner of Snoxall, now the grade II listed Goblin's Pool Hotel (Plot 1421) though it is relevant to note that it does not appear as though the application site was linked through function to this building as the dwelling is in the separate occupation of James Lenner and James Sranford (as opposed to John Allberry himself).

3.4

Later mapping from the 19th century (**Figure 3**) indicates that while the area making up the site remained in use as agricultural land, the field boundaries had changed with the numerous smaller plots being incorporated into a smaller number

of larger enclosed fields. The aforementioned almshouse can still be seen on the site edge.

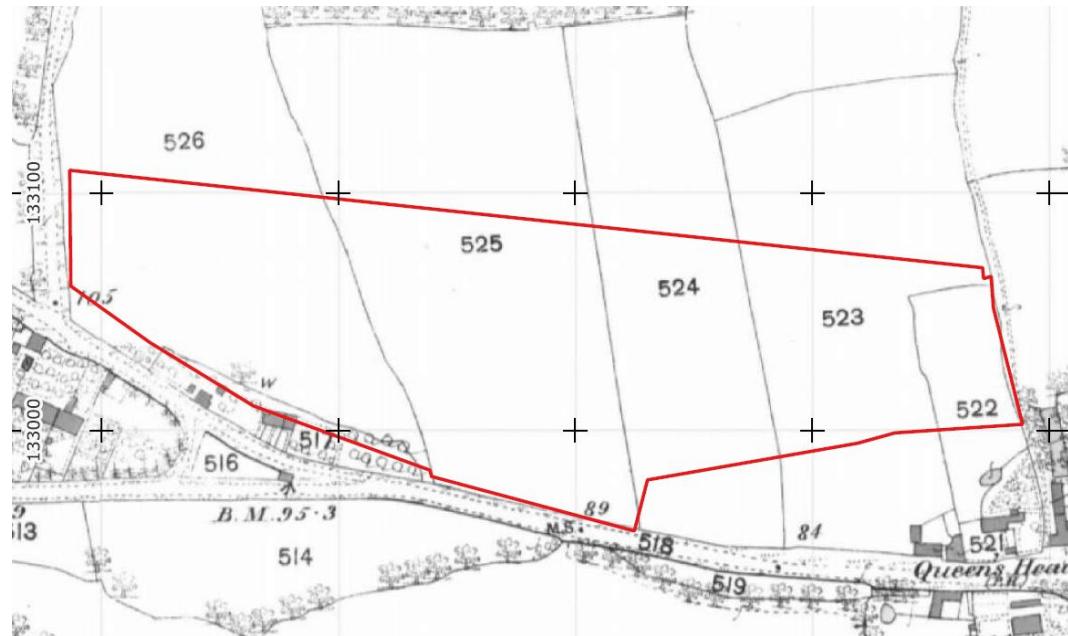


Figure 3: 1871-1877 Ordnance Survey Map

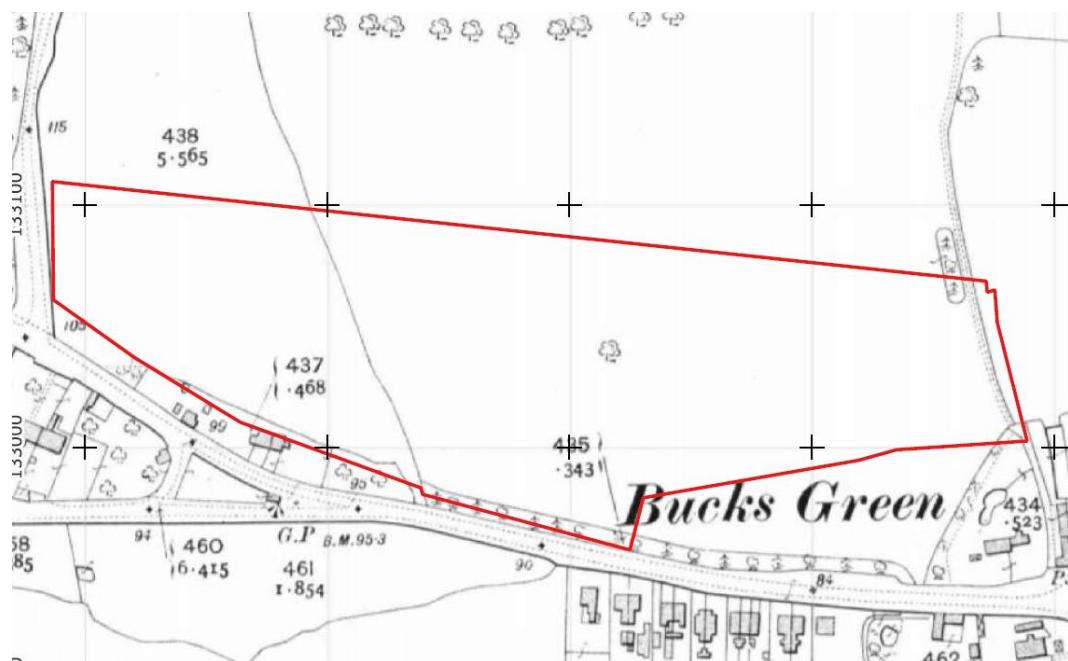


Figure 4: 1912 Ordnance Survey Map

3.5 A similar arrangement remains visible in the early 20th century (**Figure 4**) though more of the field boundaries have been removed. The situation remains comparable throughout the 20th century though, as indicated by the 1973 Ordnance Survey map (**Figure 5**), the former almshouse on the site's southern boundary has been lost by this point in time.

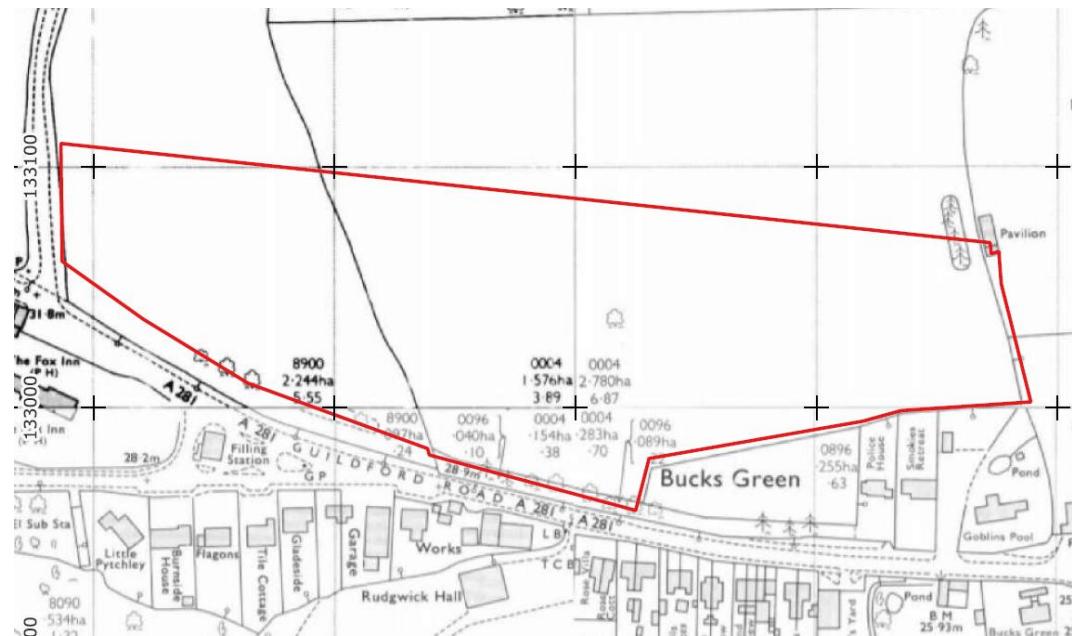


Figure 5: 1973 Ordnance Survey Map

4. Statement of Significance

Assessment of Significance

4.1 This chapter of the report establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and comments on the contribution of setting to significance. In accordance with paragraph 207 of the NPPF, the descriptions are proportionate to the asset's significance and are sufficient to understand the nature of any impact the proposals may have upon that significance.

4.2 With regards to matters of setting, the identification of the heritage assets equates to Step 1 of GPA3, and the assessment of significance equates to Step 2 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 5 (Heritage Impact Assessment) and with the tabular methodology at Appendix 2.

4.3 It is recognised that not all parts of a heritage asset will necessarily be of equal significance. In some cases, certain aspects or elements could accommodate change without affecting the Government's objective, which includes the conservation of heritage assets and which seeks to ensure that decisions are based on the nature, extent and level of significance of heritage assets. Change is only considered to be harmful if it erodes an asset's significance. Understanding the significance of any heritage asset affected is therefore fundamental to understanding the scope for and acceptability of change.

Listed Buildings on Guildford Road

Goblin's Pool Hotel (grade II)

4.4 Goblin's Pool Hotel is a grade II listed building (UID: 1026992) first designated in November 1980. Its list description, one of the older types for identification purposes only reads:

2. C17. Two storeys. Five windows. Painted brick. Horsham slab roof. Casement windows. Recessed modern addition at north-east end.



Figure 6: Goblin's Pool Hotel (grade II)

4.5

The significance of the listed building primarily derives from a combination of its special architectural and historic interest. This stems from its role as a broadly intact building with its origins in the 17th century (though some evidence suggests the building could date back in part to the 14th century), the structure's historic background and age which provides clear evidence as to its heritage values and its original residential form and function. The building's architectural interest relates to the quality and character of its external elevations, way in which this demonstrates prevalent fashions of the period and use of vernacular materials including the use of Horsham slab for the roof. While not of any particular artistic interest, the building does derive a degree of heritage value from archaeological interest as a 17th century (or perhaps earlier) multiphase building.



Figure 7: c. early 20th century photograph of the Goblin's Pool Hotel, then known as Snoxalls
(<https://rudgwick-rps.org.uk/gallery/old-bucks-green/>)

The Queen's Head Public House (grade II)

4.6 The Queen's Head Public House is a grade II listed building (UID: 1026991) first designated in November 1980. Its list description, one of the older types for identification purposes only reads:

C17 or earlier timber-framed building with painted brick infilling, first floor hung with fishscale tiles. Tiled roof. Modern casement windows. Two storeys. Three windows.

4.7 Similar to The Goblin's Pool Hotel, the significance of the grade II listed Queen's Head Public House primarily relates to a combination of its special architectural and historic interest. Architectural interest pertains to its high quality form and appearance and use of local materials and local vernacular design. Historic interest stems from the building's ability to provide evidence as to social, domestic and economic practices alongside architectural fashions of the period. As indicated by its name, while now a residential dwelling, the building was historically a public house (until the 20th century) and this provides an additional level of heritage value to the building including a degree of communal value. The building also possesses a

degree of archaeological interest as a 17th century timber framed building which was later re-fronted, seemingly in order to gentrify the building's appearance.



Figure 8: Queen's Head Public House (grade II)

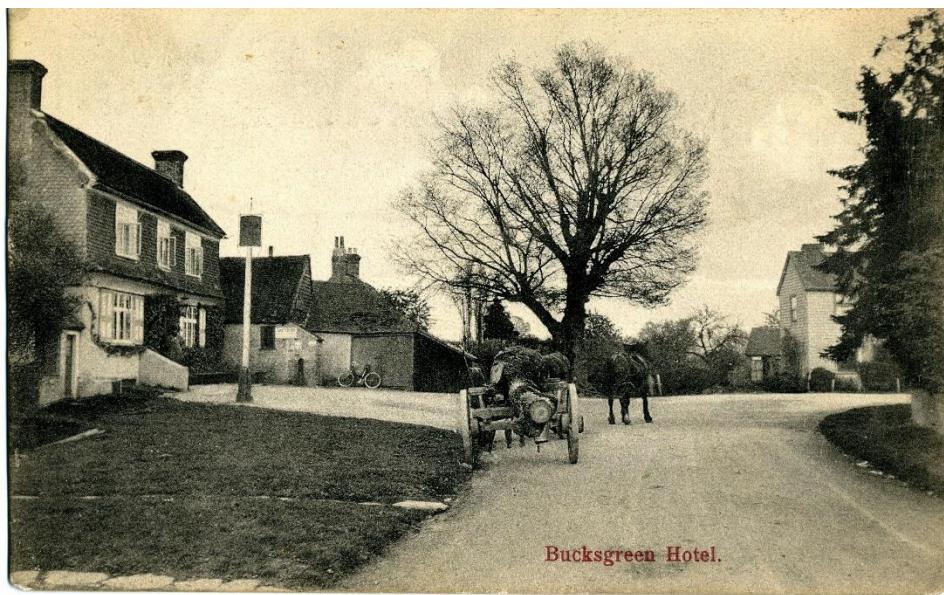


Figure 9: c. early 20th century photograph of the Queen's Head Public House
(<https://rudgwick-rps.org.uk/gallery/old-bucks-green/>)

The Fox Inn (grade II)

4.8

The Fox inn is a grade II listed building (UID: 1354189) first designated in November 1980. Its list description, one of the older types for identification purposes only reads:

Probably C17. Two storeys. Five windows. Painted brick. Eaves cornice of brick cogging. Tiled roof. Casement windows.



Figure 10: The Fox Inn (grade II)

4.9

The significance of the Fox Inn derives from a combination of its special architectural and historic interest as a 17th century former dwelling which retains a high degree of historic fabric, a locally prevalent architectural character (which includes local vernacular design and materials) and which provides evidence as to past social, domestic and economic practices. The building's current function as a public house provides a degree of communal value and its historic early 19th century use as a local poor/workhouse provides an additional degree of historic interest to the building. As with the other buildings described above, while not of any artistic interest, the building is of a degree of archaeological interest due to its

17th century origins and multiphase nature insofar as it has the potential to provide currently unknown information as to past human activity on the site.

Setting of Heritage Assets

4.10 As shown on Figure 1, all three of the listed buildings above are located on Guildford Road with the Goblin's Pool Hotel and Queen's Head Public House adjacent to each other to the northern side of the road to the east and the Fox Inn located to the southern side of the road to the west. Due to their shared location on Guildford Road, the setting of these assets is considered together for the purposes of this assessment.

4.11 The setting of these buildings along Guildford Street is, as a whole, largely altered and it is clear that these buildings are no longer appreciated in a context of rural isolation as demonstrated by historic mapping and early photographs etc. While once separate from the village of Rudgwick (to the north east) the former discrete settlements have now effectively been linked as a result of later development and it is clear that there is considerable modern residential development present within Bucks Green itself which has affected their setting. For example, Goblin's Pool Hotel and The Queen's Head Public House are now effectively surrounded on three sides (west, north and east) by a modern residential development. The Queen's Head Public House has seen further change through the enclosure of its once open front garden which allow far greater ability to appreciate the historic building from the street. The Fox Inn remains in a more unaltered located in a triangle of land between Guildford Road and Loxwood Road but modern development to the west and south is now present.

4.12 Despite the changes to the setting of these buildings, aspects of their setting which most contribute to and better reveal their significance include:

- Their respective garden areas/curtilage which seem to be consistent in form with those shown on the tithe map;
- Their relationships with the historic road patterns and spaces they address;
- Their relationships with other historic (and listed) buildings along Guildford Road and the group value this provides; and

- The way in which a general understanding of the buildings as forming part of a semi-rural village remains appreciable.

4.13 The application site is an area of open pasture located to the north of Guildford Road but is well separated from Goblin's Pool Hotel and the Queen's Head Public House as a result of modern development to the east, north and west of these buildings. A slightly greater degree of connection is present with regards to The Fox Inn but the site is separated from this asset by Guildford Road itself and tree planting on the site edge.

4.14 The application site forms part of the wider semi-rural character of the but the contribution it makes to the significance of the identified listed buildings is wholly limited and primarily relates to the way in which the site's boundary planting and sense of openness provides a semi-rural character in the immediate vicinity of the Fox Inn (grade II).

4.15 A review of the 1840 Rudgwick Tithe Map suggest that part of the land included within the Site was historically linked to Goblin's Pool Hotel (then known as Snoxalls) via a shared ownership (though apparently not function as the plots of land and dwelling were in separate occupation). This is perhaps unsurprising as landowners in rural villages often occupied large areas. Given the lack of visual and experiential connection between the listed building and the site and the absence of any functional connection, this is not found to be capable of elevating the contribution the application site makes to the grade II listed Goblin's Pool Hotel.

Listed Buildings on Lywick Street

Field Cottage and Old Cottage (both grade II)

4.16 Two listed buildings are located next to each other to the north of the application site on Lywick Street. These are Field Cottage (grade II, UID: 1026973) and The Old Cottage (grade II, UID: 1285580). Both building's were first designated in November 1980 and their list descriptions, of the older types for identification purposes only, respectively read:

C17 or earlier. Two storeys. Four windows. Ground floor red brick, above tile-hung. Tiled roof. Casement windows.

C17 or earlier. Two storeys. Three windows. Ground floor red brick, above tile-hung. Tiled roof. Casement windows, one with pointed Gothic panes. Massive stone chimney breast with brick buttress at north end.



Figure 11: Field Cottage (grade II)

4.17

The two listed buildings on Lywick Street are of heritage significance (both individually and as a small grouping) due to a combination of:

- Their historic background and age dating from the 17th century and the way in which the buildings have been extended since construction in a clearly appreciable way which allows the viewer to understand their historic development;
- Their architectural style which illustrates the prevalent fashion of the periods of their construction and changes to that style in later periods, vernacular

materials and construction technology of the area, specifically the timber framing (though mostly concealed), tile hanging and red brick;

- Their residential and domestic functions which are reflected in their built forms as a pair of rural cottages;
- Archaeological interest due to their 17th century date and multiphase nature;
- Their level of survival which contributes to their architectural and historic interest; and
- Their group value with each other.



Figure 12: The Old Cottage (grade II)

Setting of Heritage Assets

4.18 The two listed buildings along Lywick Street remain appreciated in a rural lane-edge location very much in keeping with the arrangements shown on historic mapping.

The rural character of the setting of these buildings alongside their respective gardens and relationship with the lane make a strong positive contribution to their significance.

4.19 While forming part of the wider rural surroundings of these listed buildings, the site is located c.230m south of the assets and is well removed from them, both visually and experientially. In addition, there are no known historic links between the site and these listed buildings. On this basis, the application site is a neutral component of the setting of the listed buildings which does not contribute to or better reveal their heritage values.

5. Heritage Impact Assessment

5.1 This chapter of the report assesses the impact of the proposed development on the significance of the heritage assets identified in the previous chapter, including effects on the setting of those assets. With regards to setting matters, it equates to Step 3 of GPA3, which has a close connection with Step 2. This chapter should be read in conjunction with the preceding chapter, and the tabular GPA3 assessment in Appendix 2.

Proposed Development

5.2 As identified in the Introduction, and in more detail elsewhere in the submission, the proposed development concerns an outline application for the erection of up to 90 residential dwellings (40% affordable housing) on the application site with all matters except access reserved. Vehicular access is proposed roughly to the centre of the site south onto Guildford Road with additional pedestrian access points to the east and west.



Figure 13: Proposed masterplan for the site

5.3 While an outline application, meaning full details are not yet available, it is the intention for the residential units to positively address the area's local character and be a maximum of two storeys (as per the parameters plan) with a small element comprising 2.5 storeys at the centre of the site. In addition, the masterplan demonstrates how the quantum of development could be accommodated on the site alongside open space and landscaping. In particular it demonstrates that the edges of the site would be screened by new planting with buffers of open landscape along much of the edge of Guildford Road.

Impact Assessment

5.4 As an outline application (with all matters except access reserved) full details of the scheme are unknown at this stage. As such, the following section of the assessment will assess the scheme in the broadest terms, based on the information made available as part of the application's drawn submission.

5.5 In all cases it is relevant to note that, in accordance with the assessment presented in Section 4, the identified grade II listed buildings are primarily of heritage significance due to the special interest embodied within their form and fabric. As no physical works are proposed to the buildings as part of the development, it is clear that the buildings' primary heritage values would be entirely unaffected. Nonetheless, it is acknowledged that elements of the assets' setting do contribute to and better reveal its significance and that the proposed development would result in a change within the setting of the listed buildings. The effect of this change on their significance and special interest is explored below.

Impact on Goblin's Pool Hotel and Queen's Head Public House (both grade II)

5.6 Due to their close proximity and share setting alongside their similarities in terms of heritage values, the Goblin's Pool Hotel and Queen's Head Public House have been grouped for this assessment, with individual appraisals made as and where relevant.

5.7 While the proposed development would result in a change within the setting of the two listed buildings, the following key points in this regard are noted:

- While the rural openness of the application site is a long standing element of the surroundings of the two listed buildings, it is not a part of their setting which materially contributes to or better reveal the significance of the listed buildings. Instead it is a general understanding of the village's semi-rural context which is a contributory element; and
- The openness and rural character of the site is well concealed, both visually and experientially, in conjunction with the listed buildings as a result of the intervening built form comprising the modern residential development to the asset's east, north and west.

5.8

On the basis of the above points, the development would not result in any visual change in those areas where the listed buildings can be experienced and appreciated, i.e. from Guildford Street and from their private grounds and gardens, ensuring that:

- Key views of the grade II listed buildings (which for context already include modern residential built form to the sides and rear) would be entirely unaffected as a result of the proposed development (which would not be visible from Guildford Road) and there would be no change to the building's skyline or silhouette in such views;
- Due to the lack of visibility of the development, the proposals would not be dominant or prominent within the asset's surroundings and would not compete with or cause distraction from the assets;
- The proposals would not isolate the asset, either physically or visually, from its existing surroundings and the contribution of positive elements of its setting would remain unaffected as follows:
 - i. The building's private curtilage and gardens which show historic longevity, assist in understanding the domestic and residential functions of the building and which offer an intimate arena to appreciate the significance of the grade II listed buildings;
 - ii. The buildings relationship with Guildford Road which they directly address, and which likely represents the original impetus for their siting;

- iii. The buildings' group value with other historic buildings along Guildford Street which help to provide an understanding of the historic edge of village area; and
- iv. A general understanding of the buildings as forming part of a semi-rural village would remain appreciable.
- v. The general semi-rural character of their village surroundings would remain clearly appreciable as a result of the character and landscaping along Guildford Street and glimpsed views from the road towards open space.

5.9 In addition, it is relevant to note that the new vehicular access point and changes to pavement width along Guidlford Street would be sufficiently well removed from the assets to not result in any noticeable change within the immediate surroundings of the listed buildings and that the existing public right of way (located between the two buildings) would be retained. While new development would be appreciated to the north along this footpath, the path would still provide a route from the centre of the village across residential development towards open rural countryside.

5.10 The proposed development would obviously introduce movement and activity on the application site not currently experienced and result in lighting effects in the hours of darkness associated with the residential use. However, due to the visual and experiential separation between the listed buildings and site, in conjunction with their already established modern residential surroundings, this change would not, in and of its own right, result in any detrimental effect to the assets' significance and special interest.

5.11 As identified in the preceding section, while there are some historic associations between the application site and Goblin's Pool Hotel (insofar as part of the site was historically in the same ownership at the time of the Tithe Map). However, these historic links are not unusual in a rural context and, given the present separation between the application site and listed building (a modern residential development), these are not sufficient to cause harm to significance as a result of a sensitive redevelopment of the application site.

5.12 Overall, while the application site is in close proximity to the listed buildings (between c.40-55m), due to the factors identified above and within the GPA3

compliant tabular assessment at Appendix 2, the proposed development would not lead to any noticeable change to the built surroundings or spaces of this listed buildings. In addition, the proposed development would not lead to any change to the general character of the listed buildings (or their private curtilages) and the general character of their setting would remain unaffected. The listed buildings would continue to be appreciated as a pair of 17th century village buildings of clear special architectural and historic interest which are already set within a modern residential context within wider semi-rural surroundings.

5.13 In summary, while resulting in a change within the wider surroundings of the listed building, the proposed development would not have any bearing on their significance or special interest as outlined in Section 4 of this report. While the proposed development would lead to some change within the assets' setting, as discussed above, this would not lead to any noticeable change from those areas where an appreciation of significance is possible and key views of assets and key elements of their setting which most contribute to significance would be entirely preserved.

Impact on Fox Inn (grade II)

5.14 It is acknowledged that the proposed development would result in a change within the setting of the Fox Inn and this primarily relates to the part of the site closest to the listed building, i.e. the site's western end which is located immediately north of the listed building on the opposite side of Guildford Road. While an outline application, design mitigation has been incorporated into the masterplan in direct response to this, including:

- The provision of a clear set back of built form opposite the Fox Inn, retaining a sense of rural openness around the junction of Guildford Road and Lywick Street to be maintained and minimise the presence of the new dwellings in context with the listed buildings;
- The proposals seek to retain and strengthen boundary planting to the site's edge opposite the Fox Inn. At present the boundary planting in this location provides a semi-rural character to the street and only allows filtered views into the site. This element of the streetscape would be retained as a result of the proposals.

5.15 As with other listed buildings, it is also important to note that it is not the rural openness of the application site which contributes to the setting of the listed building per say, but rather a general understanding of the village's semi-rural context which is a contributory element. This understanding would be entirely preserved as a result of the proposed development as shown on the masterplan.

5.16 Other elements of the masterplan seek to avoid effects on this asset including, for example, the location of open areas adjacent to the site's Guildford Road edge and location of the new vehicular access well removed from the listed building.

5.17 In addition, while resulting in a change to the setting of the Fox Inn, the proposed development would:

- Entirely preserve key views of the building which are possible from Guildford Road looking south (and which for context already include modern residential built form);
- Not result in any change to the building's skyline or silhouette in such views;
- Not be dominant or prominent within the asset's surroundings and would not compete with or cause distraction from the asset as a result of the visual and experiential separation between the asset and site and design mitigation worked into the masterplan;
- Not isolate the asset, either physically or visually, from its existing surroundings; and
- Not result in any detrimental effect on positive elements of the asset's setting which include its public house gardens, relationship with Guildford Road, group value with other historic buildings and, importantly, the way in which the surroundings provide evidence as to the building forming part of a village set within a semi-rural context.

5.18 The proposed development would obviously introduce movement and activity on the application site not currently experienced and result in lighting effects in the hours of darkness associated with the residential use. However, this would be minimised as a result of the site edge planting (which would still provide a screening function even in leafless conditions) and set back of development and

would not be out of keeping with the surroundings of the Fox Inn given its already established modern residential context.

5.19 Overall, while the application site is in close proximity to the listed building (c.35m) and would result in a change within that asset's setting, due to the factors identified above and within the GPA3 compliant tabular assessment at Appendix 2, the proposed development is not found to result in any effect on or harm to that asset's significance and special interest. The building would continue to be appreciated as a 17th century former dwelling, now public house, within a semi-rural village context. The proposed development would not lead to any material change from those areas where an appreciation of significance is possible and key views of asset and key elements of its setting which most contribute to significance would be entirely preserved.

Impact on Field Cottage and The Old Cottage (both grade II)

5.20 As identified, the application site is well removed, both visually and experientially, from these two listed buildings (c.230m south beyond open countryside). As a result of the distance, topography and intervening tree cover, including new planting proposed on the northern edge of the site as per the masterplan, the proposed residential units would hold either no or only wholly limited visibility in conjunction with these listed buildings, as follows:

- Views from Lywick Street towards the building's front elevations would not feature the proposed development at all ensuring that these key views of the listed buildings where their significance and group value can be best appreciated would be entirely unaltered;
- While an internal site visit has not been undertaken as part of this assessment, it is possible that views from within the listed buildings could feature the application site. However, this appears unlikely given the intervening distances and tree cover (including planting within the listed buildings' rear gardens and the new northern boundary planting to the site). Should visibility be possible, this would not affect the general rural character of the asset's surroundings; and
- In views from footpath to the east of the site may it may be possible to appreciate both the built form of the application site and the rear elevations of

the listed buildings. However, from this distance, the significance of the heritage assets cannot be clearly understood, these are not key views and the vast majority of the asset's rural surroundings would be entirely unaffected.

5.21 Other contributory elements of the setting of these listed buildings, including their private gardens and curtilages and their relationship with Lywick Street would remain entirely unaffected by the proposed development.

5.22 As such, while resulting in a change on the application site, there is no reason to believe, at this outline application stage, that the proposed development would lead to any appreciable change within the setting of the listed buildings that would be capable of resulting in a detrimental effect on their significance. As such, the significance and special interest of both Field Cottage and The Old Cottage (both grade II) would be preserved. All significance and special interest embodied within the listed buildings would be entirely unaffected and the proposed development would not, in any way, erode an ability to understand their heritage values as a pair of rural 17th century domestic dwellings.

Summary and Policy Compliance

5.23 The proposed development is based on an understanding of the character, historic development, significance and setting of the series of grade II listed building located to the south and north of the application site. The proposed development has been informed by this alongside desk based research with the residential development designed to be sensitive to the significance of the heritage assets.

5.24 As this is an outline application (will all matters reserved except access) full details of the scheme are unknown at this stage. As such, this Heritage Impact Assessment has assessed the scheme in the broadest terms, based on the information made available through the masterplan. As such, while further assessment taking into account full details will be required when they are available, it is the findings of this report that the proposed residential development is capable of and likely to (on the basis of the masterplan) entirely preserve the significance of the assets identified and thus falling outside of the remit of paragraphs 214-215 of the NPPF insofar as they will not result in any harm to, or loss of significance. There

would be preservation for the purposes of Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 and compliance with relevant local planning policies as outlined in Section 2. In particular with regards to emerging Strategic Policy HA14 Rudgwick and Bucks Green Housing allocation, while it is noted that the proposed development is for more units than the draft allocation suggests 'at least 60', in accordance with this policy, the proposals would ensure that appropriate regard is had to the impact on nearby grade II listed buildings and no harm to their significance, or setting, has been identified.

6. Conclusions

6.1 This Heritage Impact Assessment presents an assessment of significance of a series of five listed buildings located close to the application site on Guildford Road and Lywick Street. This is followed by an appraisal of the effects of the proposals upon these heritage assets with consideration given to local and national policy and guidance.

6.2 The application site is an irregular plot of undeveloped pasture land located to the north of Guildford Road, Rudgwick. There are no heritage assets (either designated or non-designated) on the application site but those nearby, and scoped into this assessment, include:

- Goblin's Pool Hotel (grade II, UID: 1026992)
- The Queen's Head Public House (grade II, UID: 1026991)
- The Fox Inn (grade II, UID: 1354189)
- Old Cottage (grade II, UID: 1285580)
- Field Cottage (grade II, UID: 1026973)

6.3 Following on from pre-application advice in 2021/2022 with HDC officers, the proposed development concerns an outline application for the erection of up to 90 residential dwellings on the application site with all matters except access reserved.

6.4 On the basis of the information available, while including additional units than the draft allocation for the site ('up to 60 dwellings') the proposed development is found to have the potential to entirely preserve the significance of the five listed buildings. While resulting in a change on the application site, the proposals would amount to a minor change within the setting of the assets which have limited to no intervisibility with the site. All significance and special interest embodied within fabric of the listed buildings would be entirely unaffected and the proposed development would not, in any way, erode an ability to understand their heritage values typically as a series of 17th century rural and village dwellings.

6.5

In summary, the proposed development within the setting of the listed buildings is considered to be proportionate and compliant with relevant policies contained within Section 16 of the NPPF and relevant local planning policy and guidance. There would be preservation for the purpose of the decision maker's duty under Section 66 of the Planning (Listed Building and Conservation Area) Act 1990.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 214 and 215, and guidance on NPPG).⁷

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
Less than Substantial Harm	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

⁷ See NPPG 2019: "Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated." Paragraph 018 Reference ID: 18a-018-20190723.

Appendix 2

GPA3 Assessment: Historic England's guidance on setting

In assessing the effect of the proposed development on the setting and significance of designated heritage assets, it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations.

Relevant Considerations	Goblin's Pool Hotel (grade II)	Queen's Head Public House (grade II)	The Fox Inn (grade II)	Field Cottage and The Old Cottage (grade II)
<i>Proximity of the development to the asset</i>	The application site is located c.40m north of the listed building beyond a modern residential development	The application site is located c.55m north of the listed building beyond a modern residential development	The application site is located c.35m north of the listed building on the far side of Guildford Road	The application site is located c.230m to the south of the listed buildings beyond open rural land
<i>Proximity in relation to topography and watercourses</i>	The topography of Guildford Road is relatively flat but land to the north (including the site) gently slopes north. There are no watercourses of relevance to these assets and the effect of the proposed development			
<i>Position of development in relation to key views</i>	Key views of both Goblin's Pool Hotel and the Queen's Head Public House are possible from Guildford Road looking north towards their front elevations and from within their respective curtilages where unobscured views of their frontages can be appreciated. Due to the intervening distances and built form (the modern residential development north of these assets) there would be no change to the views as a result of the proposed development	Key views of the Fox Inn are possible from Guildford Street looking south towards its front elevation. These views would not undergo any change as a result of the proposed development.	Key views of these listed buildings are possible from Lywick Street looking towards their front elevation (west) and from their private grounds where their elevations can be fully appreciated.	

		Views of the building's side and rear elevation are also possible from within the public house grounds and some visibility of the development may be appreciable in these views but visibility would be limited due to the retained and strengthened site boundary planting and not out of keeping with the public house's surroundings where modern development is common place	These views would not undergo any change as a result of the proposed development
<i>Degree to which development will physically or visually isolate asset</i>	Due to the existing modern residential development to the rear (north) of listed buildings which separates them from the site, the development of the application site as proposed would not physically or visually isolate the listed buildings from their rural surroundings. In addition, other important elements of their setting, such as their group value, relationship with Guildford Road and private gardens, would be entirely unaltered by the proposals	While some understanding of the development may be possible when appreciating the Fox Inn from Guildford Road and its grounds, this would be wholly limited due to the retained and strengthened boundary planting to the site and the set back of built form proposed	The listed buildings will still enjoy a rural context and the introduction of housing, set behind a planted belt some c.230m away from the assets would in no way physically or visually isolate these assets from their surroundings. In addition, there would be no

<i>Prominence, dominance and conspicuousness and competition with or distraction from the asset</i>		<p>within it. The general semi-rural character of this part of Guildford Road would be maintained and the proposed development would not physically or visually isolate the asset.</p>	<p>change to other important elements of their setting including their group value, private gardens and relationship with Lywick Street</p>
	<p>Due to the visual and experiential separation between the assets and the application site (namely the modern residential development) the proposed development would not be a prominent or dominant element of the setting of these listed buildings and would not cause any distraction from or competition with the assets</p>	<p>Due to the set back of development from the southern boundary of the site in conjunction with the retained and strengthened boundary planting to the site, the proposed development would not be prominent or dominant within the setting of the listed building and would not cause any competition with or distraction from this asset</p>	<p>Due to the significant separation between the site and listed buildings, the proposed development would not be prominent or dominant within the setting of the listed buildings and would not cause any competition with or distraction from the assets</p>
	<p>As identified the proposed development is an outline application and as such full details of the proposed scale, massing, materials and design of dwellings is not yet available. However, the intention is for residential units to be reflective of domestic proportions (as shown on the masterplan) and in keeping with the character and appearance of the surroundings</p>		

<i>Introduction of movement or activity</i>	<p>While the proposed development would introduce a degree of movement and activity onto the site not currently present, this would not lead to any notable change within the surroundings of the listed buildings due to the separation between them and the site and the assets and their existing surroundings which feature modern residential built form</p>	<p>While the proposed development would introduce a degree of movement and activity onto the site not currently present, this would not lead to any notable change within the surroundings of the listed building due to the already modern residential surroundings of the asset and intervening tree cover and set back of development between the site and listed building</p>	<p>While the proposed development would introduce a degree of movement and activity onto the site not currently present, this would not lead to any notable change within the surroundings of the listed buildings due to the separation between them and the site and the assets and their existing surroundings which feature modern residential built form</p>
<i>Diurnal or seasonal change</i>	<p>Matters of diurnal and seasonal change have been factored into the wider assessment as required both in terms of tree cover (seasonal change) and effects of nighttime lighting associated with the residential use (diurnal change)</p>		
<i>Change to built surroundings and spaces</i>	<p>Due to the existing modern residential development providing a clear visual and experiential buffer between the application site and listed buildings and the associated lack of change to the assets' experience from Guildford Street and private curtilage, the proposed development would only result in a wholly minor change to the surroundings of the listed buildings which is not found to be capable of resulting in harm to their significance</p>	<p>There would be some noticeable change within the setting of the Fox Inn as a result of the introduction of housing to the north of Guildford Road. However, the effects of this would be minimised and not</p>	<p>Due to the distances involved (c.230m), the proposed development would result in a wholly minor change to the setting and surroundings of these listed buildings which is</p>

		cause harm to significance as a result of the design of the masterplan (including the set back of built form and strengthen side edge planting) and the already modern residential character of the asset's surroundings	not capable of resulting in any detrimental effect upon their significance or special interest
<i>Change to skyline, silhouette</i>	The proposed development would not lead to any change to the skyline or silhouette of the identified grade II listed buildings		
<i>Change to general character</i>	The proposed development would not result in any change to the general character of the listed buildings (as a pair of 17 th century dwellings set within a village context) or the general semi-rural character and quality of the village's surroundings	The proposed development would not result in any change to the general character of the listed building (as a 17 th century former dwelling and now public house) or the general semi-rural character and quality of the village's surroundings	The proposed development would not result in any change to the general character of the listed buildings (as a pair of rural cottages) or the rural character and quality of their surroundings

Standard Sources

<https://maps.nls.uk>

<https://historicengland.org.uk/listing/the-list>

www.heritagegateway.org.uk

<http://magic.defra.gov.uk>

www.history.ac.uk/victoria-county-history

The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition). Historic England (2017 edition)

Planning (Listed Buildings and Conservation Areas) Act, 1990

National Planning Policy Framework, 2023

National Planning Practice Guidance, 2019

Conservation Principles, Policies and Guidance, Historic England (2008)