

Heritage Rebuttal

Gate Farm, Sutton Benger

App ref:	PL/2025/09825	Date:	26 August 2026
Client:	Gleeson Land Ltd	Reference:	227642

1. Introduction

- 1.1 We have been instructed by our client, Gleeson Land Ltd to undertake a brief review of the heritage consultation response for a current application (PL/2025/09825) relating to proposals at the above site. It should be read alongside the submitted Heritage Statement (tor&co, 2025), which provides a proportionate assessment of significance (including the contribution of setting) and impacts in accordance with NPPF guidance.
- 1.2 The purpose of these comments is, ultimately, to assist the case officer in making an objective determination on the application before the local planning authority [LPA] in proper accordance with the heritage provisions of the NPPF (as revised), particularly policies **HE4, HE5 and HE6**.
- 1.3 This note therefore responds to the conservation officer's [CO] consultation comments in relation to application PL/2025/09825.
- 1.4 The submitted Heritage Statement concluded that the proposals would result in, at most, a **low degree of harm to the significance of designated heritage assets**, specifically No. 5 High Street and Gate House Farm, arising primarily from change within their wider setting. On the other assets, the CO's response is not clearly articulated, but it is implied that a 'moderate' degree of harm to the significance of these assets is also envisaged.
- 1.5 Since the preparation of the Heritage Statement and the CO's consultation response, the illustrative masterplan has been amended in response to comments made by the Council's design and planning officers. Whilst the application remains in outline and the layout is illustrative only, the amendments seek to provide a more sensitive response to the existing settlement and heritage context, including through the introduction of additional areas of open space, a strengthened landscape structure, and a more graduated and articulated approach to built form. These amendments are considered further within this note where relevant to the assessment of heritage impacts.
- 1.6 Accordingly, the key issue between the Heritage Statement and the CO's response remains not whether harm arises, but the **degree of harm to the significance of the affected designated heritage assets**, and the weight attributed to setting in the assessment of significance. The amendments to the illustrative masterplan do not alter the fundamental basis of the heritage assessment but provide additional mitigation and further demonstrate the potential for development to respond appropriately to the identified heritage context.

2. Affected Heritage Assets

- 2.1. A number of heritage assets within the wider study area have been scoped out of further assessment, as the application site does not form part of their setting or contribute to their significance, and there is no realistic potential for effects arising from the proposed development. This is due to the absence of any direct historic or functional relationship with the site, combined with distance and the spatial, physical and visual separation created by topography, intervening development and boundary treatments.
- 2.2. In particular, several listed buildings located along High Street have been scoped out of detailed assessment. These assets derive their significance primarily from their immediate streetscape context within the historic core of Sutton Benger. The application site lies outside this context and is separated from these buildings by intervening built form and the road corridor, such that the site does not contribute to their setting in a way that informs their significance, nor would the proposed development be appreciable in views that are relevant to their historic or architectural value.
- 2.3. As set out in the Heritage Statement, and agreed by the CO, the proposed development on the application site affects the setting of the following designated heritage assets:
 - Sutton Benger Conservation Area
 - No. 5 High Street (grade II listed)
 - Gate House Farm (grade II listed)
- 2.4. The Heritage Statement provides a detailed assessment of these assets, identifying their significance as deriving principally from their architectural and historic interest, with setting making a secondary contribution, particularly in longer views and in understanding the historic evolution of the village. The crucial element is to understand how the setting contributes to the reasons why an asset is listed, not simply a description of what exists around an asset.
- 2.5. The CO broadly agrees that the Heritage Statement provides sufficient information to meet NPPF requirements but subsequently departs from its conclusions without clearly explaining how or why the assessment of significance – specifically, it seems, the contribution of setting to that significance – differs.

3. Issues and Conclusions of Consultees

- 3.1. While the CO objects to the proposals, it is noted that their comments are largely based on illustrative material submitted at outline stage. However, all matters apart from access are reserved, meaning layout, scale, appearance and materials will be subject to future reserved matters applications. Notwithstanding this, the illustrative masterplan has subsequently been amended in response to comments made by the Council's design and planning officers, demonstrating how the development could respond more positively to the character of Sutton Benger and the relationship between the site, the Conservation Area and the wider rural landscape.
- 3.2. The illustrative masterplan should therefore continue to be understood as indicative only and cannot reasonably be used to draw firm conclusions regarding impacts arising from house types, architectural detailing or final layout character. Nevertheless, the amended illustrative layout demonstrates that there is sufficient flexibility within the proposed development to respond sensitively to the identified

heritage context. In particular, the revised approach introduces additional areas of open space, including village greens within the south-eastern and central parts of the site, and provides a more articulated built form and graduated density which assists in creating a softer transition between the existing village edge and the wider countryside.

3.3. *Moderate adverse change*

- This term is used in the CO's descriptive assessment, but is not carried forward into a clear articulation of the **degree of harm to the significance of the affected heritage assets**. Under NPPF policy HE5, the relevant consideration is the effect of the proposals upon the significance of the heritage asset, including where that effect arises through development within its setting. It is therefore necessary to explain how the identified change affects the significance of each asset and the degree of harm that results.
- An assessment of a 'moderate' degree of harm would require a clear explanation of how the proposed development affects the ability to understand or appreciate the significance of the relevant designated heritage asset and, where the effect arises through setting, how the affected element of setting contributes to that significance. In the absence of that analysis, the use of the term 'moderate adverse change' does not in itself demonstrate a moderate degree of harm to significance

3.4. *Site visit and engagement with submitted material*

- There is no evidence that the CO has visited the site. Key assertions regarding gateway function, settlement form, and visual relationships appear to be desk-based and are not substantiated by reference to specific viewpoints or on-site analysis.
- We do not consider that a site can be adequately 'experienced' from a desktop exercise. Furthermore, any attempt by the CO to shore up the assessment by an *ex post facto* site visit is likely to be of limited value, owing to the need retrospectively to substantiate comments already made.
- Similarly, while the Heritage Statement is acknowledged, the response does not directly engage with its conclusions or provide a detailed counter-assessment of significance or the contribution of setting.

3.5. *Linear form of the Conservation Area*

- The CO refers to the "historic linear form" of Sutton Benger. While parts of the village do exhibit linear characteristics, the Conservation Area is also defined by incremental growth, varied plot depths and later infill. The Heritage Statement identifies this evolution and demonstrates that the settlement is not exclusively linear in form.
- The proposal site sits at the western edge of the village, outside the Conservation Area, where development patterns are already more dispersed. The suggestion that the indicative layout fundamentally conflicts with historic settlement morphology is therefore overstated, particularly at outline stage.

- Notwithstanding this, the amended illustrative masterplan has sought to respond positively to the Council's comments regarding settlement form. Within the eastern part of the site, the illustrative built form now incorporates a greater use of L-shaped and U-shaped forms, together with increased continuity of frontage, taking cues from the more enclosed and articulated forms found within the Conservation Area. This transitions towards more detached and lower-density forms within the western and northern parts of the site, providing a gradual feathering of development towards the wider rural landscape.
- The amended approach therefore demonstrates that an appropriate relationship can be established between the development and the existing settlement morphology whilst retaining a softer and less formal edge towards the countryside. The detailed configuration of buildings would nevertheless remain a matter for consideration at reserved matters stage.

3.6. *Gateway character*

- The site is described as an "important gateway" to the conservation area, yet this is not clearly defined or evidenced. The site lies outside the Conservation Area boundary and currently comprises an agricultural field with limited townscape presence. The Heritage Statement does not identify this location as a formal gateway, and no analysis is provided by the CO to demonstrate how this gateway function is experienced or how it contributes to heritage significance.

3.7. *Housing form and layout*

- Comments regarding "boxy units", suburban character, and house types relate to matters reserved for future consideration. At outline stage, such conclusions are premature. These aspects will be addressed through reserved matters, where design quality, materials, scale and layout can be shaped to respond positively to local character and heritage context.

4. **Location, Design and Materiality**

4.1. As the application is in outline, detailed design has not yet been fixed. Nevertheless, the amended illustrative material demonstrates a landscape-led approach which has evolved in response to comments from the Council's design and planning officers. Of particular relevance to the historic environment is the introduction of a village green within the south-eastern corner of the site. This provides an additional area of open space at the interface with the existing village, increases the separation of proposed built form from the Conservation Area and provides a softer landscape transition to the historic village edge.

4.2. A larger village green is also now proposed centrally within the site, extending into an area previously occupied by part of the north-eastern attenuation provision, whilst maintaining a view corridor towards the north-west of the site. Attenuation provision has consequently been divided between the north-eastern and south-eastern areas, with the potential for the latter to form part of a village green pond or similar landscape feature, subject to detailed design and landscaping. Together with structural planting and the graduated approach to built form, these amendments provide a stronger landscape framework and demonstrate the potential for development to integrate appropriately with its village-edge context.

- 4.3. The amended illustrative layout also establishes a hierarchy in built form, with more articulated L-shaped and U-shaped forms and greater continuity of frontage towards the eastern part of the site, transitioning towards more detached and lower-density forms to the west and north. This approach provides a more considered transition from the established village towards the surrounding rural landscape and responds directly to concerns regarding the potential for a suburban or abrupt development edge.
- 4.4. Future reserved matters applications will provide the opportunity to ensure that architectural language, materials, scale and detailed layouts respond appropriately to local distinctiveness and the nearby heritage assets. The amended illustrative masterplan nevertheless demonstrates that an appropriate design response can be achieved within the proposed development parameters. It is therefore inappropriate to attribute definitive townscape or architectural harm at this outline stage.

5. Impacts on Significance

Sutton Benger Conservation Area

- The Sutton Benger Conservation Area focuses on the linear historic core of the village along High Street, extending eastwards to Sutton Lane and incorporating areas of open space and development primarily related to the built form.
 - The site lies outside the designated conservation area and does not contribute to its key elements of character or appearance, which are principally derived from historic buildings and streetscape.
 - While the site marks the western edge of the village and provides a contrast to the built form along High Street, this does not form part of the significance of the conservation area.
 - A westward view from the western end of the conservation area is identified as an important view (PM1) in the Parish Character Appraisal (appendix 1 of the Neighbourhood Plan).
 - The Parish Character Appraisal does not attribute heritage significance to this view; rather, it reflects general landscape value and the rural character of the village setting.
 - The site is not identified as an important gateway or open space within the Parish Character Appraisal.
 - Key open spaces and views that make a meaningful contribution to the conservation area's character and setting are located primarily toward the eastern end of the conservation area.
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- 5.1. As mentioned at 4.12 of the submitted Heritage Statement, there is no published appraisal for the Sutton Benger Conservation Area and so our assessment drew on our own analysis and concomitant elements present within the Parish Character Appraisal, though not itself serving as a conservation area appraisal per se. The outcome was an assessment that the Conservation Area's significance derives primarily from its historic core, building groups and architectural quality, but also some contribution from surrounding agricultural land. The application site lies outside the Conservation Area boundary, and development would not directly affect its character and appearance within the designated area. The views identified in the Parish Character Appraisal are not specifically identified for, nor explicitly attributed,

any heritage significance. However, development would result in the loss of some agricultural land on its boundary, which is acknowledged as a lesser contributor to its significance.

- 5.2. The amended illustrative masterplan further responds to the relationship between the site and the Conservation Area. In particular, the introduction of a village green within the south-eastern corner of the site provides additional separation between proposed built form and the historic village edge and creates a softer, landscape-led transition when approaching and leaving the Conservation Area from the west. The larger central village green provides further relief within the built form, whilst the retention of a view corridor towards the north-west assists in maintaining a visual relationship with the wider rural landscape.
- 5.3. The revised illustrative built form also provides a more graduated transition between the existing settlement and countryside. Greater continuity of frontage and more articulated L-shaped and U-shaped forms are indicated within the eastern part of the development, taking cues from the built forms found within the Conservation Area, before transitioning towards more detached and lower-density development to the west and north. This assists in avoiding an abrupt or undifferentiated suburban edge and demonstrates how the development can respond to the existing settlement morphology.
- 5.4. The Heritage Statement concluded that development would result in a **low degree of harm to the significance of the Conservation Area**, arising principally from the loss of agricultural land and consequent change to its wider setting. The amended illustrative masterplan does not alter the basis of that assessment; rather, the additional open space, landscape structure and graduated approach to built form provide further mitigation of that change. The CO has not demonstrated how the resulting effect gives rise to a 'moderate' degree of harm, assuming that this was the CO's intention in identifying 'moderate adverse change', nor provided a clear explanation of how the affected element of setting contributes to the significance of the Conservation Area in this location.
- 5.5. **No. 5 High Street (grade II)**
 - 5 High Street (Gate Cottage) is an 18th-century former pair of cottages, now a single dwelling, forming part of the historic core of Sutton Benger.
 - The building retains its historic character and vernacular architectural detailing, with strong consistency in materials and appearance with other historic dwellings along High Street.
 - Its significance is derived primarily from its architectural and historic value as part of the village's vernacular tradition, rather than from an extensive or sensitive setting.
 - The contribution of setting to the building's significance is limited; it is no longer clearly legible as an edge-of-settlement building, although it does mark the edge of the historic core.
 - Views northwards across the site towards Gate Cottage form only a minor and ancillary element of its wider agricultural setting.
 - The main road between the site and the listed building largely delineates its setting, focusing its significance within the established built form of High Street.

- The building's significance is principally experienced within its immediate streetscape and relationship with adjacent vernacular buildings, including Gate Farm, rather than through its relationship with the site.

5.6. **Gate House Farm (grade II)**

- Gate Farmhouse is a 17th-century listed building with later 18th- and 19th-century additions, located approximately 50 m south-east of the site.
- Its significance is derived from its historic and architectural value as a vernacular farmhouse, constructed in rubble stone and characteristic of the wider village of Sutton Benger.
- The primary contribution of setting to significance relates to the immediate farmstead buildings historically associated with Gate Farm.
- The wider agricultural setting makes a lesser contribution to significance due to fragmentation of land ownership and piecemeal development at the western edge of the village.
- The conversion of former Gate Farm outbuildings to residential and small-scale business use has reduced their functional and visual relationship with the farmhouse.
- The site makes only a minor contribution to the setting of Gate Farmhouse as a former part of its historic landholding.
- The site is no longer legible on the ground as part of the Gate Farm complex and does not materially contribute to the understanding of the farmhouse as an active farmstead.
- While the site forms part of the agricultural edge-of-settlement character, its contribution to the farming character of Gate Farm and to the significance of Gate Farmhouse is minimal.

5.7. The amended illustrative masterplan provides further mitigation in respect of the relationship between development and Gate House Farm. In particular, the introduction of the south-eastern village green provides an increased area of open space between proposed built form and the existing village edge, assisting in maintaining physical and perceptual separation from the historic built environment in this location. Together with the proposed landscape framework and more articulated built form within the eastern part of the site, this demonstrates the potential for development to respond sensitively to the wider setting of the listed building. The detailed treatment of this relationship would remain subject to consideration at reserved matters stage.

5.8. These listed buildings derive significance principally from their architectural and historic interest. Their relationship to the application site is limited, with intervening roads, existing development, and boundary treatments reducing intervisibility.

5.9. As identified in the Heritage Statement, development would be perceptible within elements of the wider setting of these assets but would not affect key elevations, principal views or their immediate historic context. The issue is therefore the **degree to which change within their wider setting would harm their significance**. For the reasons set out above, the Heritage Statement assesses this harm as limited and of a low degree, reflecting the relatively minor contribution that the affected elements of setting make to the significance of the listed buildings.

- 5.10. Again, the conservation officer does not clearly articulate how setting contributes to the significance of these buildings (rather than simply exist as *de facto* surroundings). In the absence of setting out this essential groundwork, it is not clear how the proposals would erode that significance to a “moderate” degree.

6. Conclusion

- 6.1. Taking the above into account, we have a number of concerns about the robustness and accuracy of the CO’s response. First and foremost, we are concerned that the response may not have been informed by a site visit. In the same vein that any conservation officer would find fault with such an omission from an applicant, it is logical that the same be true in reverse. There is no reason why a CO’s desktop assessment should be considered in preference to one informed by on-site analysis; indeed, we would argue that the former is more readily open to challenge.
- 6.2. Both the Heritage Statement and the CO identify harm arising to the significance of designated heritage assets through change within their setting. The principal area of disagreement concerns the **degree of that harm**. The CO describes the effect on the Conservation Area as ‘moderate’. On the other assets, the CO’s response is not clearly articulated, but it is implied that a similar degree of harm to their significance is envisaged.
- 6.3. While the proposals would introduce change to the rural edge of Sutton Benger, the submitted Heritage Statement demonstrates that the effects on the significance of the Sutton Benger Conservation Area, No. 5 High Street and Gate House Farm would be limited. The identified harm arises from change within their wider setting and is assessed as being of a **low degree**, but not to an extent that would seriously affect or undermine the way in which the significance of these designated heritage assets is experienced or understood.
- 6.4. Since the preparation of the Heritage Statement and the CO’s consultation response, the illustrative masterplan has been amended in response to comments made by the Council’s design and planning officers. Although the layout remains illustrative and detailed matters are reserved, the amendments provide further evidence that the site is capable of accommodating development which responds sensitively to the historic settlement and its rural edge. In particular, the introduction of village greens within the south-eastern and central parts of the site, the retention of a view corridor towards the north-west, the strengthened landscape framework, and the transition from more articulated built forms in the east towards detached and lower-density development in the west and north all assist in moderating the effects of development upon the wider setting of the affected heritage assets.
- 6.5. The amended illustrative masterplan therefore reinforces, rather than alters, the conclusions of the submitted Heritage Statement. There would remain a degree of change to the agricultural setting at the western edge of Sutton Benger, but the revised approach demonstrates how that change can be appropriately moderated through layout, open space, landscaping and the disposition of built form. Consequently, there is no basis to conclude that the amendments would increase the **degree of harm to the significance of the affected heritage assets**

previously identified; rather, they provide additional mitigation and reinforce the assessment that any harm would remain **limited and of a low degree**.

- 6.6. The CO's objection does not follow a transparent heritage assessment process and relies heavily on illustrative material at outline stage, without sufficient engagement with the submitted Heritage Statement or clear evidence of on-site appraisal. Furthermore, the subsequent evolution of the illustrative masterplan demonstrates that the matters raised by the CO are capable of being addressed through the design process and, ultimately, through appropriate control at reserved matters stage.
- 6.7. Importantly, the CO does not clearly demonstrate:
- how setting contributes to the significance of each asset in this specific location;
 - how the degree of harm has been assessed; or
 - why this harm should be considered "moderate" rather than low, particularly having regard to the amended illustrative masterplan and the additional mitigation now demonstrated.
- 6.8. In accordance with NPPF policy **HE6**, where harm to the significance of a designated heritage asset is identified, **substantial weight should be given to the asset's conservation**, and the identified harm should be weighed against the public benefits resulting from the proposal. In this case, those benefits include housing delivery, affordable housing provision, landscape enhancement and biodiversity gains. This balancing exercise ultimately sits with the decision-maker.
- 6.9. On this basis, it is considered that the heritage impacts of the proposal have been appropriately assessed and that the amended illustrative masterplan provides further evidence that those impacts can be appropriately mitigated. The identified **harm to the significance of the affected designated heritage assets remains limited and of a low degree** and, having regard to the requirements of the NPPF, the Conservation Officer's recommendation for refusal is not justified on heritage grounds.