



Heritage Impact Assessment

Rats Castle, Linchmere Road, Haslemere, Sussex

August 2023 | Project Ref 7947A











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1. Introduction

- **1.1** This Heritage Impact Assessment has been prepared by HCUK Group on behalf of Barry Stanley. It relates to an application for alterations and the provision of an extension at Rats Castle, Linchmere Road, Haslemere. Waverley Borough Council (WBC hereafter) are the determining authority.
- **1.2** Rats Castle is a grade II listed building (UID: 1025944) first designated in November 1987. The building likely originates in the 16th or 17th century and is a small timber framed building clad in brick and local sandstone with a later (early 20th century) extension.



Figure 1: Rats Castle (grade II)

1.3 In accordance with the requirements of Paragraph 194 of the National Planning Policy Framework (2021) this statement describes the significance of the identified heritage assets.



The Proposals and Relevant Background

- **1.4** The proposals at Rats Castle have been based on a thorough understanding of the significance of the listed building and seeks to sensitively upgrade the structure as a single family dwelling while preserving its unique heritage values.
- **1.5** Full details of the proposals are found elsewhere in the application submission and provided drawings but can be summarised as:
 - The introduction of a subterranean extension to the building's east (accessed through the catslide internally);
 - Introduction of a en-suite to the master bedroom (formerly bedroom 4);
 - Introduction of conservation rooflights to the master bedroom and en-suite; and
 - General refurbishment throughout.

Purpose of this Assessment

1.6 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 National Planning Policy Framework (NPPF) 2021 and local planning policy. The site and heritage assets affected have been observed and assessed following a site visit made by the author in April 2022.



2. Relevant Planning Policy Framework

- 2.1 The decision maker is required by sections 16(2) and 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** 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
- **2.3** 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.
- **2.4** 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 201 and 202 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**.

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.

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).



2.5 Paragraphs 201 and 202 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 201 or 202 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.

- **2.6** Paragraphs 199 and 200 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that affect its significance, irrespective of how substantial or otherwise that harm might be.
- **2.7** WDC's adopted Local Plan includes the Core Strategy Local Plan (February 2013) and saved policies of the adopted Wealden Local Plan (1998).
- **2.8 SP02:** This strategic planning objective notes that the Council will ensure that the intrinsic quality of the historic environment is protected and that heritage assets are used appropriately.
- **2.9** Saved Policy EN27 Layout and Design of Development: This policy notes does not specifically relate to heritage but notes that development will be permitted when the scale, form, site coverage, density and design of the development and the use of materials and landscaping should respect the character of adjoining development and, where appropriate, promote local distinctiveness. It notes that the design, materials and landscaping should be of an appropriate high standard.

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



3. Background and Development

3.1 While likely having its origins in the 16th or 17th century, Rats Castle is first seen on the 1846 Linchmere Tithe Map (**Figure 2**). This map shows the building (listed as Plot 127) as a simple rectangle in form facing onto the road with access provided via a track to the east. Rats Castle is shown as having a modest irregular plot with a small detached out building can also be seen adjacent to the junction between the drive and road.

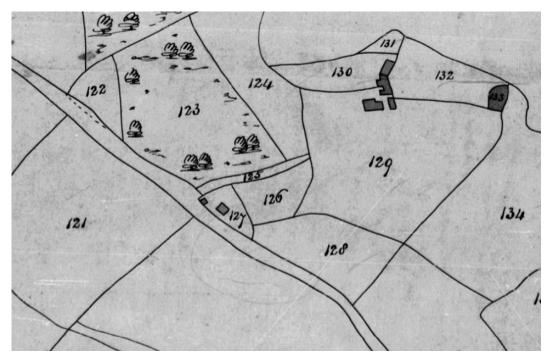


Figure 2: 1846 Linchmere Tithe Map © The Genealogist

- **3.2** The associated Tithe Apportionment lists the property as 'Cottage and Garden' and shows that it is owned by James Simmonds and occupied by William Smith. James Simmonds was also the owner and occupier of the paper mill which can be seen to the north of Rats Castle on the Tithe Map.
- **3.3** The building is next seen on the 1872-1880 Ordnance Survey (OS hereafter) Map (**Figure 3**). The form of Rats Castle, its outbuilding and plot can be seen and are comparable with that shown on the Tithe Map. A well is also shown within the plot alongside a pond and various trees. An orchard can be seen on land to the west.



This map also shows the new railway line and former paper mill to the north of Rats Castle with the former paper mill now a flour mill and named 'New Mill'.

3.4 The 1897 OS Map (**Figure 4**) shows a comparable situation with key changes being the apparent extension of Rats Castle's plot to include the ponds and the mill now being in disuse.

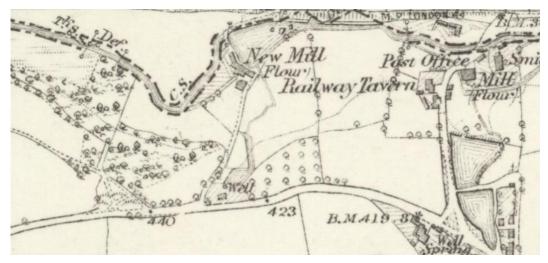


Figure 3: 1872-1880 OS Map (surveyed 1862-1875). Reproduced with permission of the National Library of Scotland

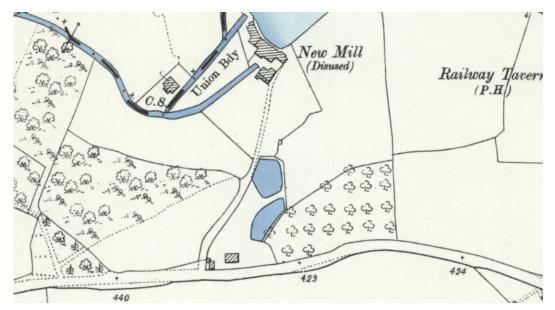


Figure 4: 1897 OS Map (surveyed 1895). Reproduced with permission of the National Library of Scotland



3.5 By the time of the 1916 OS Map (**Figure 5**) minor changes can be seen with a small extension to the eastern end of Rats Castle and the introduction of a trout farm on land to the north of the building. Development in the wider area, including Hammer Brick works can also be seen.

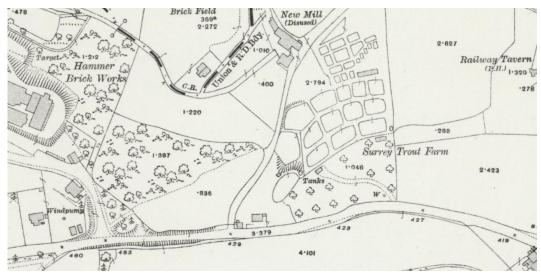


Figure 5: 1916 OS Map (surveyed 1913). Reproduced with permission of the National Library of Scotland

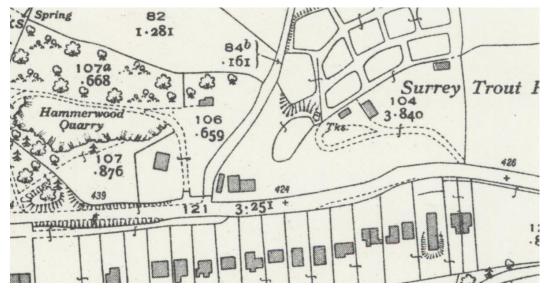


Figure 6: 1941 OS Map (surveyed 1938). Reproduced with permission of the National Library of Scotland

3.6 The first major change to Rats Castle is seen by 1938 (**Figure 6**) whereby the former outbuilding and eastern addition have been demolished and a large western



extension and detached garage added to the site. The plot also appears to have been increased in scale. The residential development of the wider area can also be seen.

- **3.7** The building does not appear to have been extended or materially upgraded since this time.
- **3.8** Rats Castle was subsequently grade II listed in 1987. Its list description, one of the older types for identification purposes only reads:

House. C18. Coursed Hythe sandstone with red brick dressings and quoins. The westernmost window-bay is red brick on ground floor and tile-hung above with gable over. Tiled roof. Casement windows. 2 storeys. 4 windows.

3.9 Census records provide little information as to the occupants of Rats Castle over the 19th and 20th centuries. However, the 1939 Register shows that the building was, at this time, seemingly occupied by two separate families (perhaps with the early 20th century extension having originally been constructed as a separate dwelling). It was then apparently sold later in the same year and purchased by Robert Lochner MBE who lived in the property between 1939 and his death in 1965. Lochner's occupancy at Rats Castle is commemorated by a blue plaque on the building's northern elevation which reads:

Robert Lochner MBE 1904-1965

Inventor of the Mulberry Harbour floating breakwaters which supported the D-Day landings in June 1944 lived here from 1939 until his death

Description of Rats Castle

3.10 As identified above, the historic core of Rats Castle likely dates to the 16th or 17th century and comprises a simplistic rectangular two storey structure. The front elevation was historically facing the road (which is at a notably higher level) and it is likely that one of the windows was historically a front door. The building appears to have been reorientated at some point meaning that its main access is now to the rear (north) likely because of the notable change in levels and close proximity to



the now busy road. The rear of this part of the building (north) features a catslide roof to the rear that is likely to be a slightly later (though still historic) addition which now contains the main entrance porch and a bathroom.

- **3.11** At ground floor level the historic core of the building is, aside from the catslide, primarily a single open space (sitting room) with a large fireplace and narrow winder staircase to the northern side of the stack. At first floor this part of the building provides two separate rooms both of which show exposed timber framing.
- **3.12** Externally this part of the building is constructed from a combination of local sandstone and red brick.
- **3.13** To the west of the historic core of the building is a two storey extension construction between 1913 and 1938 based on historic mapping. Based on an a review of the fabric, a date of the 1920s or 30s is likely. This part of the building features a red brick ground floor with tile hung first floor and tiled hipped roof. Internally, this part of the building is basic in its detailing and character. To the ground floor it features a kitchen, dining room and stair hall and at first floor includes two bedrooms. While the earlier building and later core are linked internally at ground floor, there are no connections to the first floor.

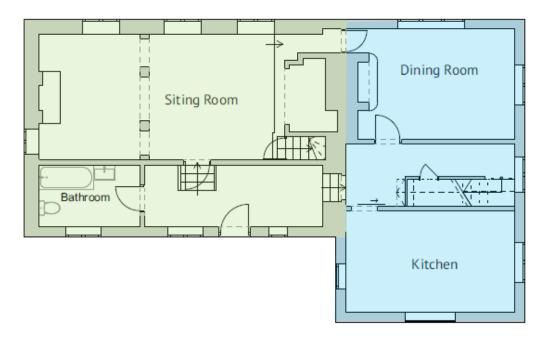


Figure 7: Phasing plan (ground floor) of Rats Castle. Historic 16th or 17th century portion in green and later early 20th century addition in blue





Figures 8 and 9: Photographs showing the exposed timber framing at ground and first floor level



Figures 10 and 11: Historic winder staircase located within the historic core of the building



Figures 12 and 13: Dining room and staircase located within the early 20th century extension



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. In accordance with paragraph 194 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** 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.

Rats Castle (grade II)

- **4.3** Rats Castle is a grade II listed building of clear architectural and historic interest. That is primarily focused on the 16th or 17th century core of the building (as opposed to the later early 20th century extension which is of much lower significance and sensitivity to change.
- **4.4** Architecturally the interest of the building relates to the quality and character of the historic core of the structure, its external form and appearance with local sandstone walls and internal plan form, detailing and timber frame. The external form of the building is highly evocative of its modest domestic 16th or 17th century origins. The later rear catslide, simplistic internal plan form and prominent chimney eastern breast all contribute to this element of its interest. Further architectural interest relates to the palette of materials which reflect the local vernacular and the



building's timber frame which is exposed internally at both ground and first floor. At first floor the timber frames king post roof with curved struts can be clearly seen.



Figure 14: Rats Castle (sales catalogue photograph, c.2022)



Figure 15: Main living room at Rats Castle (sales catalogue photograph, c.2022)





Figures 16 and 17: Rear catslide (left) and first floor bedroom (right) at Rats Castle

- **4.5** The way in which the building's orientation has been changed (i.e. the historic front elevation was to the south but it is now accessed from the north) in conjunction with the building's lack of street presence (in part due to the changing levels) has affected the way in which the building is appreciated. Nonetheless, when approaching from the north along the seemingly original western access drive, the architectural interest of the building can be appreciated.
- **4.6** The building is also of clear illustrative (historic) interest as a result of the evidence it provides regarding domestic, social and economic practices of the past. The more recent associations with the engineer Robert Lochner also provide a degree of associative (historic) interest to the building and this is commemorated with the blue plaque places on the building's northern elevation. This interest is elevated insofar as Lochner is understood to have experimented at the pond at Rats Castle, ultimately resulting in the safe landing of vast numbers of men and supplies on the D-Day landings in 1944.
- **4.7** The building is also of some archaeological interest as a result of its early post medieval origins, multiphase nature and the potential for the building to provide as yet unknown information regarding past human activity.
- **4.8** The early 20th century (c.1920s or 30s) extension to the building's western elevation is not of any inherent architectural or historic interest in its own right but has been carefully design to visually reflect and be respectful of the earlier, and



more modestly scaled, core of the building. Internally within this part of the building the finishes and fabric is entirely modern.



Figure 18: The gardens and pond at Rats Castle (sales catalogue photograph, c.2022)

4.9 The setting of Rats Castle contributes to its heritage values and an appreciation thereof. Specifically this relates to the relationship the building has to the road, western drive and its private curtilage, most notably the garden's dramatic topography (which slopes notably down to the pond in the north) and the pond which has been a consistent feature of the building's surroundings.



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. This chapter should be read in conjunction with the preceding chapter, and the drawn submission of the application.

Proposed Development

- **5.2** As identified in the Introduction, the proposals amount to various minor alterations to the grade II listed buildings which can be summarised as:
 - Introduction of a en-suite to the master bedroom (formerly bedroom 4)
 - Introduction of conservation rooflights to the master bedroom and en-suite; and
 - General refurbishment throughout.
- **5.3** The main element of the proposal entails the introduction of a subterranean extension to the building's east. This extension is proposed to be set within the significantly sloping character of the site providing clear views out to the grounds and lake to the north of the house. The new extension would be accessed through the ground floor catslide (which would be altered to remove the bathroom and provide a staircase) and would provide a new kitchen and living room and master bedroom.

Impact Assessment

5.4 As can be evidenced from the photographs provided in this report, the grade II listed building is in significant need of a general refurbishment to bring it up to modern living standards. These works typically include the replacement of bathroom and kitchen fittings, upgrades to the building's heating and electrical systems and redecoration including the replacement of modern floor coverings



(carpet, vinyl and tile). Where needed facias, windows and soffits would be repaired or, if required due to their deteriorated condition, replaced in a like for like fashion. These works would not affect the significance of the building in any way but would make the structure fit for purpose as a dwelling in the 21st century and ensure that the building's future maintenance and conservation was taken into account.

- **5.5** Physical alterations to the historic building relate to minor changes at first floor level within the earlier core. The existing historic partition and door dividing the space would be retained with the smaller room (Bedroom 4) being converted into an en-suite to Bedroom 1. New services required for the en-suite could be easily accommodated into this space without the need for material or intrusive alterations to the building and while the character of this room would change, its historic fabric and proportions would be retained while enhancing the functionality of the building as a dwelling house (i.e. providing an upstairs bathroom).
- **5.6** Bedroom 1 and the proposed en-suite are both particularly dark rooms as a result of the lack of windows on the northern elevation (due to the catslide roof) and the presence of only two low windows on the southern elevation which do not provide sufficient natural light as a result of the vegetation and change in levels beyond. As such, proposals seek to introduce three conservation roof lights (two in the bedroom and one in the en-suite) which would sit between historic rafters and provide additional natural light. The exact location of these roof lights is, as yet, unknown given the plastered internal face of the roof meaning the exact location of rafters is not clear. However, no rafters would be cut as a result of the roof lights. While the roof lights will result in a change to the building, both internally and externally, this is not found to be harmful or detrimental change with no historic fabric affected and, due to the nature of the conservation roof lights, the overall external character and profile of the roof structure retained.
- **5.7** Within the early 20th century extension, the only change is the introduction of a ground floor WC within the study. This minor change would not affect any sensitive or important historic fabric and would have no impact on historic plan form.
- **5.8** As noted above, the main element of the proposed development relates to the provision of a subterranean extension to the east. The extension would essentially create a basement level of accommodation, outside of the historic core of the building, which responds to the site's dramatic sloping topography.



- **5.9** The extension is proposed to be constructed from rubble sandstone, echoing the materiality of the listed building, but would be a clearly modern addition to the site with a flat and landscaped roof (upon which a new garden and seating area would be created) and large curved areas of glazing. The form, siting and materiality of the proposed extension take advantage of the topography and allow clear visibility north across the building's gardens and pond.
- **5.10** While large in footprint, the siting and form of the extension ensure that it would not dominate views towards Rats Castle. Importantly, the extension would not be visible from either Linchmere Road or the access drive and would only be readily visible once within the site and to the north of Rats Castle, looking north towards its historic rear (but now front) elevation. In these views, while the extension would be clearly visible, it would be appreciated as a high quality modern addition which would sit below, and therefore not obscure or obstruct, visibility of the historic building (**Figure 19**).



Figure 19: CGI modelled view from the north looking towards Rats Castle and the extension

5.11 In views from the front door and gravelled garden area (adjacent to the parking area) a sense of the built form would be appreciable (the retaining side wall of the extension) but this would be low down as a result of the topography and



naturalistic landscaping proposed would assist in limiting any sense of built form (**Figure 20**).



Figure 20: CGI modelled view towards the extension from the west

- **5.12** Important aspects of the building's surroundings (its relationship with the road, driveway and pond and the gardens' topography) would not be affected by the proposed extension.
- **5.13** In order to ensure that the extension is properly linked to and fully serves Rats Castle, it is proposed to be accessed from within the rear (north) catslide. As noted in the preceding section, while likely a later addition to the building, the catslide is clearly a historic feature and contributes to the interest of the building. Proposals seek to retain the catslide and internally, remove the existing bathroom and excavate to provide a staircase down into the extension.
- **5.14** The partition separating the bathroom from the hallway and bathroom fittings are all modern additions to the building, seemingly dating to the mid 20th century. In addition, the flooring with the bathroom appears to be entirely modern with the brick tiles present in the main catslide area stopping short of the partition. On this basis, the proposals to excavate down and provide a new staircase to the extension would not result in the loss of any historic fabric. The new staircase itself and the change in levels would be a notable change within the catslide which would change



the character of this space. However, visually, there will remain a clear distinction between the above ground historic elements of built form and the below ground modern additions. This contrast can be further evidenced on site through the use of materials and detailing within the staircase and its surrounding walls.

- **5.15** Overall, the proposed addition will be clearly appreciable as a high quality clearly modern addition to the listed building which would not, due to its subterranean location and the surrounding topography, be prominent in views towards the grade II listed building. The proposed extension will not detract undue attention away from the historic building and, due to the character of the addition and its subterranean nature, would not obscure or obstruct views of Rats Castle.
- **5.16** Both internally and externally, the addition will read as a simplistic modern element of built form which sits comfortably against the historic architecture and relates to it in a positive manner in terms of materiality and response to the landscaped context. The high quality, modern character of the proposed extension is an honest addition to the building, allowing the multiphase structure's development to be clearly appreciated while being clearly informed by the site and its surroundings. There is clear precedent for providing a positive juxtaposition between historic and modern architecture and it is well established that this can enhance the varied and rich character of streetscapes.
- **5.17** As such, for the reasons identified above, the proposed extension would not result in any erosion of or harm to the special interest and significance of the listed building. Instead, the proposals represent an opportunity to provide high quality, locally referenced modern architecture which contributes to the building's multiphase nature and history of being altered and added to by each successive owner.

Summary and Policy Compliance

5.18 The proposed development is based on an understanding of the character of Rats Castle (grade II, its historic development and significance. The proposed development has been informed by this alongside desk based research and on-site assessment of surviving historic fabric with the proposals being specifically



designed to enhance the functionality of the building as a grade II listed dwelling while being sensitive to, and where possible, enhancing the significance of the asset.

5.19 As identified above, the proposals are found to entirely preserve the significance of the grade II listed building meaning that it is the findings of this report that the proposed works would fall outside of the remit of paragraphs 201-202 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 Sections 16 and 66 of the Planning (Listed Building and Conservation Areas) Act 1990. The proposals are also found to accord with relevant local planning policy and objectives.



6. Conclusions

- **6.1** This Heritage Impact Assessment presents an assessment of significance of the grade II listed Rats Castle. 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** Rats Castle is a grade II listed building located on the northern side of Linchmere Road. While it's list description suggests a date of the 18th century, it is clear based on its fabric and form that the building has earlier origins, likely in the 16th or 17th century. This part of the building is of clear architectural, historic and archaeological interest. A later two storey extension (constructed between c.1913 and 1938) is of no inherent architectural or historic interest and located to the building's western edge.
- **6.3** As identified in the Introduction, the proposals can be summarised as the introduction of a subterranean extension to the building's east (accessed through the catslide internally) and various minor internal works including a general refurbishment, introduction of a en-suite to the master bedroom (formerly bedroom 4) and introduction of conservation rooflights to the master bedroom and en-suite.
- **6.4** Section 5 of this report presents an assessment of the impact of the proposed works on the significance of the identified heritage assets and concludes that while amount to a clear change to the building, the proposals would not affect the significance of the asset. This is primarily due to the lack of historic fabric proposed to be removed, the subterranean nature, siting, form and materiality of the proposed extension and landscaping proposals.
- **6.5** In summary, the proposed works to the grade II listed building are 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 Sections 16 and 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 201 and 202, 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.



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, 2021 National Planning Practice Guidance, 2019 Conservation Principles, Policies and Guidance, Historic England (2008)