



LONDON OFFICE

Ms Hebe Smith
Arun District Council
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Our ref: L01603540; P01603543

5th March 2026

Dear Ms Smith

**Arrangements for Handling Heritage Applications Direction 2015
& T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**BARNHAM COURT, CHURCH LANE, BARNHAM PO22 0BP
Application Nos BN/127/25/HH; BN/128/25/L**

Thank you for your letter of 16th February 2026 regarding the above applications for planning permission and listed building consent. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

Introduction

The current submissions follow earlier planning and listed building consent applications for a programme of investigative opening-up works intended to reveal concealed historic fabric and construction details. These works sought to improve understanding of the building's condition, development and significance, informing future conservation and repair strategies and ensuring that design alterations were focused on less significant areas.

At that time, we requested provision of additional information, including a Heritage Impact Assessment, compliant to paragraph 207 of the *National Planning Policy Framework* (NPPF), to describe the building's historic development, planform, age and significance, and to demonstrate how this understanding had informed the proposals.

We also sought broader contextual information on the design intentions for the site to understand the rationale behind the proposed opening-up works.

The applications were subsequently withdrawn on 6th February 2026.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

[HistoricEngland.org.uk](https://www.HistoricEngland.org.uk)

The current submissions have been presented in response to the information previously requested.

Summary

Barnham Court is an exceptionally important grade I listed building and a leading example of Artisan Mannerism.

While several proposed works are acceptable in principle, some elements - such as the removal of the secondary staircase, the lowering of the link-area floor and removal or relocation of historic floor finishes - risk harming historic fabric and compromising legibility of historic circulation patterns and planforms.

In order to be able to properly assess the harm to significance and justify the changes, further information and clarification are required: evidence of the staircase's origin; sectional drawings of the link to understand the potential impact of the proposed floor-level changes; and justification for the proposed alterations to existing floor finishes at ground floor level.

In addition, as requested previously, a complete Heritage Impact Assessment - proportionate to the exceptional importance of this grade I asset - should be provided, as required by paragraph 207 of the NPPF.

Significance of Barnham Court

Barnham Court is one of the finest surviving examples of Artisan Mannerism in England. Its distinctive brickwork, gables, and carefully patterned façades closely parallel those of Kew Palace and Broome Park, suggesting strong stylistic and possibly workshop connections.

The building's proportions and refined detailing were praised by the architectural historian Sir Nikolaus Pevsner, who regarded it as "the best of its date in the county" and noted its "all-over magnificence combined with precision and elegance,"¹ emphasising its exceptional design quality.

Built in the mid-17th century, possibly for a wealthy merchant, the house may sit on the site of a 13th-century manor, later functioning as both a high-status residence and farmhouse. Its fabric preserves evidence of original 17th-century construction techniques and later 19th-century alterations, including expanded service quarters. The potential medieval predecessor also suggests below-ground archaeological interest.

¹ Nairn, Ian, Pevsner, Nikolaus, *The Buildings of England: Sussex* (Yale, 2001).

Positioned within a historic rural landscape of orchards and formal gardens, the house benefits from a setting that enhances both architectural appreciation and historic legibility. As one of the very few pre-19th-century buildings in the area, Barnham Court is central to understanding Barnham's development. Its long-standing presence near St Mary's Church reinforces historic settlement patterns and contributes significantly to the local landscape and the character of the conservation area.

Overall, Barnham Court holds exceptional architectural, historic, and group significance, fully justifying its grade I status.

Impact of the Proposals on the Significance of Barnham Court

The proposals form part of a phased programme of repair, refurbishment, and reconfiguration of the house, including upgrading of building services and incorporation of renewable technologies.

The current phase introduces a series of internal and external alterations aimed at improving the building's functionality, enhancing internal circulation and upgrading thermal performance, plumbing and electrics.

Many elements of the scheme are acceptable in principle from a heritage perspective, as they involve removal of modern fabric of limited interest and its replacement with more appropriate components.

Externally, the installation of traditional estate-style fencing within the front garden and arrival sequence, set back from the existing low brick and flint boundary walls, would preserve visibility and character of these historic features. A like-for-like unpainted timber close-boarded fence is also proposed around the garage along the eastern boundary with the neighbouring church.

Internally, the proposals include the removal of poor-quality modern boxed-in radiators across all floors, together with the replacement of modern double and single internal doors of no heritage value. The acceptability of these interventions remains subject to the submission and approval of detailed proposals for the replacement elements.

However, we have concerns principally regarding the proposed removal of the secondary staircase in the breakfast room of the eastern service annexe and the lowering of the link-area first floor to rationalise levels and circulation, while increasing usable accommodation. These interventions could harm the significance of the listed building through potential loss of historic fabric and legibility of historic circulation pattern and planform.

The historic phased plans included in the Design and Access Statement (February 2025) identify the breakfast room as mid- to late-19th-century in date, with the link structure from the early 20th century. Historic plans indicate a south range adjoining the house existing since at least 1846, originally with a double-stepped configuration later reduced to a single range.

The origin of the existing secondary staircase remains unclear. Although the Design and Access Statement (p.38) refers to detailed photographs of the staircase within the appendix, no such images are included. The Statement of Significance (December 2025, rev. A) provides no dating evidence for the staircase, nor does it include an impact assessment evaluating harm to significance arising from the proposed works.

Nevertheless, it appears customary that the two-storey service wing would historically have contained a secondary servants' staircase. Maintaining the legibility of this distinct vertical circulation route is therefore important to understanding the building's historic use and development.

The proposed lowering of the link-area floor may be invasive and could affect the historic planform and the continuity of the existing wall panelling.

The proposed removal of the internal wall in the breakfast room may similarly result in the loss of historic fabric and alter the planform of this part of the building. The intention to retain nibs and downstand would, however, help mitigate the impact to some extent by preserving a trace of the original subdivision.

Regarding floor finishes, there appears to be a discrepancy between the Schedule of Works (January 2026) and the Design and Access Statement in relation to the proposed treatment of floor surfaces within the rear reception room and the kitchen.

The Schedule of Works proposes the removal of the stone tiles in the rear reception room - intended to be replaced with engineered floorboards - with the lifted stone to be reused in the kitchen following the removal of the existing brick tiles, as well as for infilling the void left after the proposed wall demolition. Conversely, the Design and Access Statement indicates that the brick tiles in the kitchen are to be temporarily lifted for inspection and then relaid, implying retention and reinstatement of the existing finish rather than its replacement with stone.

Clarification is required, as the floor finishes appear to be historic and their removal or replacement would therefore result in harm to the building's significance.

Additional harm may arise from relocating the first-floor bathroom due to potential impacts from new drainage routes.

Policy Context

The *National Planning Policy Framework* (NPPF, December 2024) sets out the Government's policies for planning decisions. Section 16 specifies how the historic environment should be conserved and enhanced and paragraph 208 emphasises that conflicts between the conservation of the heritage asset and any aspects of a proposal should be avoided or minimised.

Paragraph 212 states that when considering the impact of a proposed development on a heritage asset, local planning authorities should give great weight to preserving the asset's significance, with greater weight for more important assets.

Paragraph 213 requires clear and convincing justification for any harm or loss to a designated heritage asset's significance, whether from alteration, destruction, or development within its setting. Decision-makers must determine whether harm is substantial or less than substantial. Where harm is less than substantial, paragraph 215 requires it to be weighed against the proposal's public benefits.

Historic England's Position on the Proposals

Although many elements of the current scheme can be considered acceptable in principle from a heritage perspective, some aspects would result in harm to significance.

In particular, the removal of the secondary staircase in the service wing and the lowering of the link-area first floor may lead to the loss of historic fabric and compromise legibility of the building's historic circulation patterns and use.

Further information on the staircase's origin is necessary to assess the level of harm. Sectional drawings of the link area would also assist in understanding the potential impact of the proposed floor-level changes.

In addition, clarification and justification should be provided regarding the proposed removal and relocation of existing floor finishes at ground-floor level, so that the resulting effect on significance can be properly evaluated.

Finally, as requested for the original submissions, a complete Heritage Impact Assessment - proportionate to the exceptional importance of this grade I asset - should be provided, as required by paragraph 207 of the NPPF. This document should identify origin and significance of all relevant components of the building and clearly explain how that significance would be affected by the proposals.

Recommendation

Historic England has concerns regarding the applications on heritage grounds. Further information and amendments should be sought, as set out in our advice, in



order to fully understand the extent of harm arising from the proposed works and to ensure that the applications meet the requirements of paragraphs 208, 212 and 213 of the NPPF.

In determining these applications, you should bear in mind the statutory duty of sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Relevant is also section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 that requires LPAs to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

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

Yours sincerely

Luciana Gallo

Luciana Gallo RIBA PhD FSA
Assistant Inspector of Historic Buildings and Areas
London and South East Regions Group
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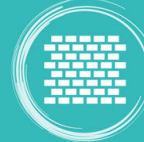
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PL- Consultation- Historic England response

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From: Hebe Smith <Hebe.Smith@arun.gov.uk>

Sent: 05 March 2026 16:00

To: Planning.Responses <Planning.Responses@arun.gov.uk>

Subject: FW: HE Consultation Response: BN/127/25/HH; BN/128/25/L - Barnham Court, Church Lane, Barnham PO22 0BP

Hello,

Please can this consultation response from Historic England be uploaded to BN/127/25/HH and BN/128/25/L.

Thanks very much,

Hebe Smith (she/her)

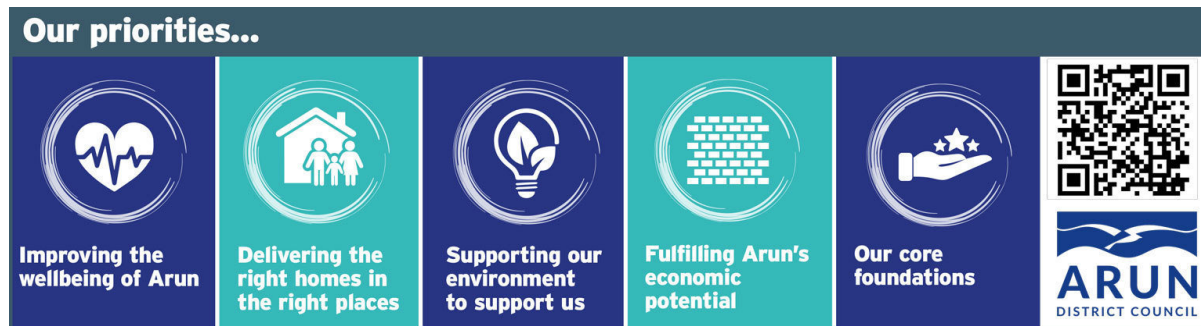
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From: Gallo, Luciana [REDACTED]

Sent: 05 March 2026 11:09

To: Hebe Smith <Hebe.Smith@arun.gov.uk>

Subject: HE Consultation Response: BN/127/25/HH; BN/128/25/L - Barnham Court, Church Lane, Barnham PO22 0BP

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Dear Hebe

Please find attached our consultation response on proposals at the following site:

Barnham Court, Church Lane, Barnham PO22 0BP
Application Nos BN/127/25/HH; BN/128/25/L

If you need further assistance, please get in contact.

Kind regards
Luciana

Luciana Gallo RIBA PhD FSA
Assistant Inspector of Historic Buildings and Areas
London and South East Regions Group



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