

11 Heritage

11.1 Scope of Assessment

- 11.1.1 This chapter of the ES assesses the likely significant effects of the Proposed Development in terms of Heritage and is supported by **ES Volume 3, Appendix G Heritage Impact Assessment (HIA)**.
- 11.1.2 The chapter describes: the assessment methodology; the baseline conditions currently existing at the Site and in the surrounding area; the likely significant environmental effects; the mitigation measures required to prevent, reduce or offset any significant adverse effects; the likely residual effects after these measures have been employed; and the 'Type 2' ('inter-project') cumulative effects associated with the Proposed Development in combination with other developments within 5 km of the Site.
- 11.1.3 'Type 1' cumulative ('intra-project') effects, which are combined effects of individual EIA topic effects on a particular receptor, are considered in **ES Volume 2, Chapter 13: Effect Interactions**.

11.2 Key Legislation, Policy and Guidance Considerations

- 11.2.1 The Heritage assessment has been undertaken within the context of relevant planning policies, guidance documents and legislative instruments. These are summarised below.

Legislation and Regulation

- 11.2.2 Planning (Listed Building and Conservation Areas) Act, 1990. Section 66(1) states:
In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Planning Policy

- 11.2.3 Chapter 16 of the NPPF provides protection for designated heritage assets, and their settings. Paragraphs 207-215 are particularly relevant to this application and are set out in more detail in the HIA.
- 11.2.4 Paragraph 207 states that applicants should describe the significance (or importance) of heritage assets affected by a development proposal, with consideration given to any contribution made by their settings to this significance.

- 11.2.5 Paragraph 212 states that “great weight” must be given to the conservation of designated heritage assets and that the more important the heritage asset, the greater this weight should be.
- 11.2.6 Paragraph 215 states that, where less than substantial harm is identified, this harm must be weighed against the public benefits of a proposal.
- 11.2.7 The Tandridge District Core Strategy (October 2008) sets out the District Council’s approach on heritage matters at Chapter 16. It does not prescribe any specific heritage policies, but does state emphasise that statutory protection is provided to listed buildings under the 1990 Act.
- 11.2.8 The Tandridge Local Plan Part 2: Detailed Policies (July 2014) sets out the District Council’s approach on heritage matters at Chapter 20. This includes policy DP20: Heritage Assets, which emphasises the mitigation of harm to heritage assets.

Tandridge District Council Plan 2033

- 11.2.9 The replacement Local Plan was submitted for examination in January 2019 and hearings took place in Autumn 2019.
- 11.2.10 The Inspector’s report, received by the council in early 2024, stated that the plan was not capable of being found sound. The council subsequently resolved on 18 April 2024 to withdraw the submission version of its draft Local Plan under s.22(1) of the Planning and Compulsory Purchase Act 2004.
- 11.2.11 Work on the new local plan is underway but is at a very early stage so will not have any bearing on the determination of this application. The most recent Local Development Scheme refers to submission of the new local plan in 2026 and adoption in 2027.

Technical Standards and Guidance

- 11.2.12 The Planning Practice Guidance (PPG) provides additional information in relation to heritage matters to aid the application of the NPPF. This includes a definition of the different heritage interests that form an asset’s significance, or value. These comprise historic, architectural, artistic and archaeological interests, which are defined in the HIA.
- 11.2.13 The Setting of Heritage Assets (Historic Environment Good Practice Advice in Planning: 3 (2nd Edition; 2017)) prepared by Historic England sets out a standard methodology for assessing the impact of development within the setting of heritage assets. This chapter follows the 5-step process set out by Historic England.
- 11.2.14 A similar methodology for assessing any changes to heritage assets is also provided within Managing Significance in Decision-Taking in the Historic Environment Historic Environment Good Practice Advice in Planning: 2 (2015).

11.3 Assessment Methodology

11.3.1 This Chapter (and the accompanying HIA provided at **Appendix G**) follows the 5-step process set out by Historic England in The Setting of Heritage Assets. This requires an applicant to:

1. Identify which heritage assets and their settings are affected;
2. Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
3. Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
4. Explore ways to maximise enhancement and avoid or minimise harm; and
5. Make and document the decision and monitor outcomes.

Determination of Baseline

11.3.2 To identify relevant heritage assets, the following sources were consulted:

- National Heritage List for England (NHLE);
- Surrey Historic Environment Record;
- Tandridge District heritage sources; and
- Cartographic sources, including historic maps.

11.3.3 A site visit was subsequently undertaken to identify relevant heritage assets in the local area that may be affected by the development, either by virtue of their physical proximity to the Site or their visual relationship. The first site visit was undertaken in November 2021. Further site visits were undertaken, including a winter visit in January 2024 and a summer visit in August 2024.

11.3.4 Discussions were subsequently held with Historic England and Surrey Council, as heritage advisors to Tandridge District Council, to understand the scope of assessment and relevant heritage assets. This has confirmed that the proposed development has the potential to affect the setting of three listed buildings, which are identified below.

Prediction Methodology

11.3.5 The approach to assessing significance of effects requires the author to first identify the value of the relevant heritage receptor before assessing the magnitude of impact arising from the development, in line with the definitions set out in **Table 11.1** and **Table 11.2**. This allows an overall significance of effect to be assessed and identified in line with the matrix outline in **Table 11.3**.

Table 11.1 Value of Heritage Receptors

Value	Example
High	World Heritage Site Grade I listed building Grade II* listed building Grade II listed building that displays exceptional characteristics Conservation Area that displays exceptional characteristics and/or contains a high proportion of highly graded heritage assets (e.g. Grade I and II* listed buildings)
Medium	Grade II listed buildings Conservation Areas that are well preserved
Low	Locally listed buildings Conservation Areas that have been degraded, or include a high proportion of buildings of limited/no historic value

11.3.6 In terms of the magnitude of impacts, the following definitions are used:

Table 11.2 Magnitude of Impacts

Value	Example
Substantial	The Development considerably alters the heritage values of the heritage assets or the ability to appreciate those values.
Moderate	The Development alters to a clearly discernible extent the heritage values of the heritage assets or the ability to appreciate those values.
Minor	The Development alters to a minor extent the heritage values of the heritage assets or the ability to appreciate those values.
None	The Development does not change the heritage assets or the ability to appreciate those values.

11.3.7 Impacts can be beneficial, adverse, or neutral:

- A beneficial impact is one that enhances the value of a receptor, or allows that value to be better appreciated (e.g. by removing a feature within its setting that obscures or diminishes views).
- An adverse impact is one that reduces the value of a receptor, or diminishes the ability to appreciate that value (e.g. by adding a structure that obstructs an important view of the receptor).
- A neutral impact is one that neither enhances nor diminishes the value of the receptor.

11.3.8 It should be noted that the term “value” is used throughout this Chapter to describe the importance of the relevant heritage receptors (as defined above). This differs

from the terminology of the NPPF, which uses “significance” to describe and define the importance of a heritage asset. For the purposes of this Chapter, the term “significance” is used to define the overall magnitude, or importance of effect, as defined in **Table 11.3**.

Table 11.3 Overall Significance of Effect

Importance / Value of Asset	Magnitude of Potential Impact			
	Substantial	Moderate	Minor	None
High	Major	Major	Moderate	Minor/None
Medium	Major	Moderate	Minor	None
Low	Moderate	Minor	Minor	None

11.3.9 It should be noted that ‘moderate’ to ‘major’ effects may be considered, for the purpose of the ES Chapter, to be significant effects unless indicated otherwise, following consideration of the extent, duration and context of the effect and the application of professional judgement. In those instances where minor and no effects are identified, they are not considered to be significant.

Limitations and Assumptions

11.3.10 The application is made in outline and all the assessment of effects is therefore based on the parameters plans included as part of the application. For the purposes of this assessment, the impacts and effects identified are based on the maximum parameters.

11.3.11 Initial consideration has been given to heritage receptors within 500m of the Site, with any receptors beyond this radius not likely to be affected due to a lack of views or historic associations. This search radius has then been refined through site visits to understand the relationship between the Site and relevant heritage receptors in the local area.

11.4 Scoping and Consultation

11.4.1 An EIA Scoping Report (presented in **ES Volume 3, Appendix A1**) was submitted to Tandridge District Council (TDC) on 22nd August 2024 with a formal request for a Scoping Opinion on the proposed scope of the EIA and assessment methodologies. TDC subsequently issued their Scoping Opinion on the proposed scope and methodology of the topics for assessment within the EIA. A copy of TDC’s Scoping Opinion is provided in **ES Volume 3, Appendix A2**.

11.4.2 A summary of the key points raised in TDC's Scoping Opinion, relevant to Heritage, are presented in **Table 11.4**, including a response as to where the comments have been addressed.

11.4.3 In addition, consultation has been undertaken with Historic England throughout the pre-application process. This has included two site visits undertaken by Historic England and a site meeting held on 21st of August 2024. As a result of these discussions, additional viewpoints have been assessed in this Chapter.

11.4.4 Pre-application advice and a scoping response has also been provided by Surrey County Council's Historic Buildings Officer. This related primarily to the scope of the assessment and potential mitigation measures, as set out below.

Table 11.4: TDC Scoping Opinion Comments and Response

Summary of Comment	Response or location within the ES where comments are addressed
Court Farm House should also be considered	See paragraph 11.5.7-8
Summer and winter views should be considered	See Appendix G, Plates 3-7
I would encourage to the applicant to ensure the proposed dwellings reflect the Surrey vernacular style, in particular through the use of materials such as clay tiles and bricks. Consideration should also be given to the location of open spaces to see whether a suitable buffer can be created between the development and St Mary's Church. It would also be preferable to have the view toward the church along the existing Right of Way kept open.	See paragraphs 11.7.4 and 11.8.1

11.5 Baseline Assessment and Identification of Key Receptors

11.5.1 Through a review of relevant data sets, the site visits and scoping process, the following heritage receptors have been identified as being relevant to this assessment:

- Church of St Mary, Grade I listed building (NHLE 1189608) located approximately 80m east of the Site. This is a receptor of High value.
- Court Farm House, Grade II listed building (NHLE 1029739) located approximately 100m south-east of the Site. This is a receptor of Medium value.
- Blunt House, Grade II listed building (NHLE 1377646) located approximately 195m west of the Site. This is a receptor of Medium value.

11.5.2 A brief description of the value of these receptors and their settings is provided below. Reference should also be made to Section 3 of the HIA (**ES Vol 3, Appendix G**) which provides a more detailed setting assessment.

11.5.3 **Church of St Mary:** the church is a multi-phased building constructed from a mixture of flint, rubble stone and brick. It was heavily restored in the 19th century, which included the removal of some tracery and decorative work. It includes a 12th century west tower, with a nave, chancel and north porch.

11.5.4 The value of the listed building includes its historic interest as a medieval building that provides evidence of past construction methods and religious practices, together with its architectural and artistic interests. It is a receptor of high value.

11.5.5 The setting of the listed building includes its elevated position in a semi-rural location. The church historically formed part of a small cluster of buildings along with the Manor House (later replaced by Court Farm House, discussed below) and associated agricultural buildings. However, this isolation has been reduced by the construction of dwellings on St Mary's Close and Wheeler Avenue in the 20th century. To the north-west, the listed building retains a rural setting, which includes the Site.

11.5.6 The immediate, churchyard setting and association with Court Farm House both contribute to the historic interest and value of the listed building. The wider setting now makes a mixed contribution. In general terms, the surviving agricultural land makes some contribution to the historic interest of the listed building, with the Site historically forming part of the manor and reinforcing the agricultural economy of the local area. However, this contribution is limited by physical separation and changes to the local landscape. The Site also permits some views of the church tower, though these are limited and heavily filtered, and do not allow for a detailed appreciation of the building's architectural interest or value.

11.5.7 **Court Farm House:** this building was constructed in the 16th century, before being remodelled in the 19th century. It was historically a single farmhouse, but is now subdivided into two dwellings and has a Victorian appearance externally. The building replaced the earlier manor house and provides some evidence of the ongoing development of Oxted. The value of the building is drawn particularly from its historic interest, with some associated architectural interest. It is a receptor of medium value.

11.5.8 The setting of the listed building includes the close association with the Church of St Mary, which still provides some evidence of the medieval development and post-medieval redevelopment of this nucleated settlement that historically sat apart from Oxted. Beyond this, the setting of the listed building has been notably changed, both due to its change of use away from agricultural activities (which has included the subdivision of the building) and the residential development of the surrounding area. There is a historic association between the listed building and the Site (as recorded on the 1839 Oxted tithe map) but this is no longer appreciable when on the Site or in the

local area due to the substantive changes seen. The Site makes no contribution to the value of the listed building.

11.5.9 **Blunt House:** this building was constructed in the 1880s by J.M Oldridd Scott as his own dwelling. It includes some elements, such as fireplace surrounds, taken from the original Blunt House on which it was modelled. It is constructed in a neo-Georgian style and is a deliberate imitation of the original Blunt House in Croydon. The value of the building lies in its historic interest and related architectural interest as a deliberate imitation of Georgian architecture. It is a receptor of medium value.

11.5.10 The building is located within its private grounds to the south of Barrow Green Road and elevated above the level of the Site. The grounds include mature planting and areas of lawn, together with a large-scale extension to the listed building. This immediate setting continues to contribute to the value of the listed building, although it has been changed by its current care home use.

11.5.11 There are limited views of the building permitted from the Site's elevated eastern area. These views are restricted to partial and filtered view even in winter months and do not allow for an appreciation of the building's architectural interest. The Site makes no contribution to the value of the listed building.

Future Baseline (the 'do nothing' scenario)

11.5.12 There would be no change to the baseline conditions described above, in the absence of the Proposed Development, assuming the existing land uses within the Site are retained.

11.6 Identification and Description of Changes Likely to Generate Effect

11.6.1 At Construction Phase, the changes likely to generate an effect include:

- Noise and movement associated with construction traffic
- Visual changes arising from the construction activities

11.6.2 At Operational Phase they include:

- Changes to land use and character
- Visual changes
- Movement, noise and activity arising from occupation

11.7 Assessment of Likely Significant Effect

Construction Phase

Embedded Mitigation Measures

11.7.1 During construction, the embedded mitigation measures will include the hoarding of the Site which will limit views into and across the Site as well as the implementation of the Considerate Contractors Scheme (CCS). Mitigation of the construction period through construction hoardings will limit visibility of the ongoing construction works and will provide a clean boundary to the Site.

Anticipated Effects

11.7.2 **Church of St Mary:** the Proposed Development will introduce additional noise within the setting of the listed building, together with associated construction activity and an alteration to views from/to the receptor. This has the potential to slightly alter and diminish the tranquillity of the receptor's setting. However, these works will be temporary in nature and will not therefore give rise to significant effects.

11.7.3 The construction works will result in a minor adverse impact to a receptor of high value, equating to a minor adverse temporary significance of effect.

11.7.4 **Court Farm House:** the construction works will result in changes to the wider setting of the listed building, but will not alter the current appreciation of it as a pair of dwellings, et within a semi-domestic setting. The magnitude of impact will be none, with the overall significance of effect also none.

11.7.5 **Blunt House:** the construction works will temporarily alter some partial, distant views of the asset. This will not diminish the ability to appreciate the receptor's value, with the magnitude of impact being none. The significance of effect will also be none.

Anticipated Effects of Applying the Development Parameter Range

11.7.6 There would be no change by applying the maximum parameter range during construction.

Operational Phase

Embedded Mitigation Measures

11.7.7 The design and layout of the development proposals has been informed by the Site's relationship with nearby heritage assets and particularly the Church of St Mary. The proposals allow for the retention of open space and views to the listed building. This will help to retain some appreciation of the building from within the Site and reduce potential harm. Consideration has also been given to the quantum, density and scale

of development (including building heights) to ensure that it is in-keeping with its surroundings and does not impinge on views.

Anticipated Effects

11.7.8 **Church of St Mary:** the Proposed Development would alter an element of the listed building's historic, rural setting and alter its historic interest as a result. This will arise primarily due to a change in land use and alteration of the approach from the north-west, rather than due to any visual impacts. This will alter the current transition between the churchyard and agricultural land to the west, affecting the historic interest of the listed building.

11.7.9 This would result in a low adverse impact to a receptor of high value. This would be a permanent and irreversible impact, which would therefore lead to a permanent, adverse minor significance of effect. This is not considered to be a significant effect.

11.7.10 **Court Farm House:** the Proposed Development would result in changes to the wider setting of the listed building, but this is now experienced as functionally and visually divorced from the listed building. This change would not therefore alter the value of the listed building.

11.7.11 The magnitude of impact will be none, with the significance of effect also therefore none.

11.7.12 **Blunt House:** the Proposed Development would alter some long-distance views to the listed building but these would not diminish the value of the building, with these limited views not providing any appreciation of the receptor's architectural interest or value. The limited change to these views will not affect the value, with the magnitude of impact being none. The significance of effect will also be none.

Anticipated Effects of Applying the Development Parameter Range

11.7.13 The above assessment is based on the maximum parameters and therefore represents a "worst case" scenario in terms of heritage effects. Reducing the quantum, scale or density of development would all potentially reduce the level of effects identified to the Church of St Mary. However, a reduction is unlikely to remove the effect entirely and there would remain a residual moderate-minor adverse significance of effect.

11.8 Scope for Additional Mitigation Measures

Potential Additional Mitigation Measures

11.8.1 Future reserved matters applications will provide opportunities to further reduce adverse effects through the detailed design of the Proposed Development. This may include provision of appropriate materials and further refinements to the layout, density and massing of development.

Likely Effectiveness of Additional Mitigation Measures

11.8.2 The introduction of these measures are unlikely to remove, or notably reduce the significance of effect which would likely remain as a moderate-minor adverse significance of effect which is judged to be not significant.

11.9 Residual Effects

11.9.1 Following the effective implementation of the embedded and / or additional mitigation measures proposed above, there are no significant residual effects arising from the Proposed Development during construction or operational phases.

11.10 Cumulative Effects

11.10.1 Cumulative effects are the combined effects of several development schemes (in conjunction with the Proposed Development) which may, on an individual basis be insignificant but, cumulatively, have a significant effect.

11.10.2 The ES has given consideration to 'Cumulative 'Effects'. However, none of these schemes will affect the heritage receptors identified within this Chapter. It is considered that there will be no cumulative effects during the construction and operation of the Proposed Development.

11.11 Summary and Conclusions

11.11.1 The Site forms part of the setting of three heritage receptors:

- Church of St Mary, Grade I listed building (NHLE 1189608) located approximately 80m east of the Site. This is a receptor of High value.
- Court Farm House, Grade II listed building (NHLE 1029739) located approximately 100m south-east of the Site. This is a receptor of Medium value.
- Blunt House, Grade II listed building (NHLE 1377646) located approximately 195m west of the Site. This is a receptor of Medium value.

11.11.2 At present, the Site contributes to the value of the Church of St Mary, but makes no contribution to the other heritage receptors.

11.11.3 The relevant heritage receptors have been identified through the EIA scoping process and pre-application discussions, including discussions with Historic England. This allowed the relevant receptors to be identified and assessed, and allowed for appropriate mitigation measures to be developed to respond to the setting of the Church of St Mary.

11.11.4 The Proposed Development includes embedded mitigation in the form of open space and the retention of important routes and some, limited views.

11.11.5 The construction stage effects will be temporary in nature and arise primarily from construction activities. The temporary nature of these works will not give rise to any significant effects to the relevant heritage receptors.

11.11.6 The operational stage will give rise to no effects to Court Farm House and Blunt House. It will give rise to a low adverse impact to the Church of St Mary due to the change in land use and character. The Church of St Mary is a receptor of high value. This change will result in a moderate-minor, permanent adverse significance of effect. This is judged to be not significant for the purposes of this Chapter.

11.11.7 Although future reserved matters applications provide the opportunity to refine the proposals and reduce the impacts, the overall significance of effect is unlikely to reduce.

11.11.8 The Proposed Development will therefore lead to a residual adverse effect to the Church of St Mary. However, this arises from a low adverse impact which results in a moderate-minor significance of effect. For the purposes of this assessment, this is not considered to be a significant effect.

11.11.9 **Table 11.5** summarises the (topic) effects resulting from the Proposed Development.

Table 11.5: Summary of Residual Effects

Receptor/ Affected Group	Value or Sensitivity (Significance) of Receptor	Activity or Impact	Embedded Design Mitigation	Magnitude/ Spatial Extent/ Duration/ Likelihood of Occurrence	Significance of effect	Additional Mitigation	Residual Magnitude of Impact	Significance of Residual effect
Construction								
Church of St Mary	High	Noise and visual changes arising from construction activity	N/A	None	None	None	None	None
				Local				
				Temporary				
				Likely				
Court Farm House	Medium	Noise arising from construction activity	N/A	None	None	None	None	None
				Local				
				Temporary				
				Likely				
Blunt House	Medium	Visual changes arising from construction activity	N/A	None	None	None	None	None
				Local				
				Temporary				
				Likely				
Operation								
Church of St Mary	High	Changes to land use and character,	Restrictions of siting, density and height of	Low	Moderate- Minor Adverse	Potential to reduce impacts at	Low adverse	Moderate- Minor
				Local				
				Permanent				

Receptor/ Affected Group	Value or Sensitivity (Significance) of Receptor	Activity or Impact	Embedded Design Mitigation	Magnitude/ Spatial Extent/ Duration/ Likelihood of Occurrence	Significance of effect	Additional Mitigation	Residual Magnitude of Impact	Significance of Residual effect
		together with some visual changes and additional activity	development, together with retention of open space	Likely		reserved matters stage through further design refinement		Adverse (not significant)
Court Farm House	Medium	Changes to land use and character	N/A	None Local Permanent Likely	None	None	None	None
Blunt House	Medium	Changes to views	N/A	None Local Permanent Likely	None	None	None	None