

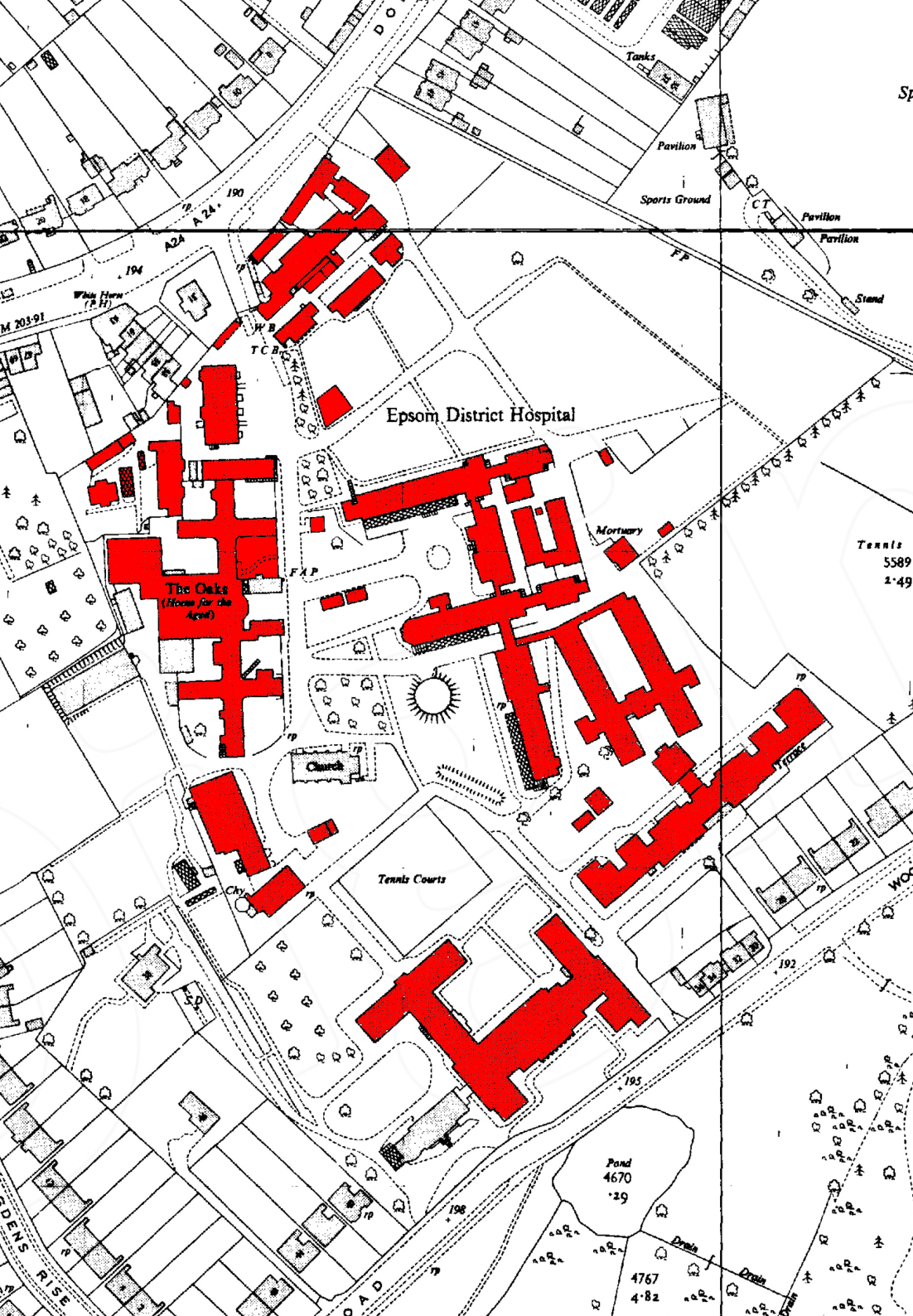


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Epsom Hospital, Dorking Road, Epsom

Heritage Townscape and Visual Impact Assessment
For Senior Living Urban (Epsom) Ltd

February 2021



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Contents

1.0	Summary of Heritage Townscape and Visual Impact Assessment	1
2.0	Built Heritage Site Constraints	3
3.0	Historical Background	6
4.0	Site Survey Descriptions	16
5.0	Identification of Heritage Assets and Assessment of Significance	19
6.0	Identification of Townscape and Visual Receptors and Assessment of Sensitivity	41
7.0	Impact Assessment	48
8.0	Conclusions	85
	Appendix I – Statutory List Descriptions	86
	Appendix II - Planning Policy and Guidance	92
	Appendix III – Miller Hare Verified Views and Methodology	109



Location plan with the site marked in red

1.0 Summary of Heritage Townscape and Visual Impact Assessment

1.1 Introduction

Donald Insall Associates was commissioned by Senior Urban Living (Epsom) Ltd in June 2019 to advise on emerging proposals and to provide a Heritage Townscape and Visual Impact Assessment (HTVIA) to accompany a planning application for the redevelopment of the southern part of the Epsom General Hospital site, centred at national grid reference TQ204597 (henceforth referred to as the 'study site'). Following the refusal of planning application 19/01722/FUL in November 2020, the proposals for the site have been amended; this Heritage Townscape and Visual Impact Assessment has been updated to reflect the revised scheme and support the current resubmission.

1.2 Methodology for identification of Townscape, Visual and Heritage Receptors

The investigation has comprised desktop and archival research and a survey of the study site and surrounding area to identify the existing townscape character and visual receptors requiring consideration; and to identify heritage assets whose significance may be affected as a result of the study site's development. The study site does not contain any heritage assets nor is it located within a conservation area – the assessment therefore is limited to assets found in the surrounding area which may be affected as a result of changes to their settings. The townscape, visual and heritage receptors identified largely fall within a 500 metre radius of the study site, an area from which the proposals are likely to be visible, but also include a number of strategic views at a distance. The location of the 15 verified views presented were discussed and formally agreed with Epsom & Ewell

Borough Council (EEBC) on 8th October 2019, and have been produced by Miller Hare according to a standard methodology (see Appendix III). No amendments to this approach have been requested from EEBC with regards to the current application. The current assessment considers the same 15 views using the same methodology.

1.3 Consultation and the Development of the Proposals

Pre-application advice provided in relation to the previous scheme for the site by EEBC in July 2019 noted in respect to Design and Heritage that '...high quality buildings are expected at the Site and great weight will be given to outstanding or innovative designs, which promote high levels of sustainability and which help to raise the standard of design more generally in the area. A contemporary design is considered appropriate for this Site. The proposal should assimilate with its surroundings...' Historic England were asked if they intended to engage with the project team on proposals for the site. They responded on 26th November 2019 to the effect that whilst they would be a statutory consultee 'In this instance we do not consider it necessary for us to participate in pre-application discussions'. Feedback from EEBC provided throughout a series of PPA meetings including those following refusal of the previous scheme has been used to inform the current resubmission.

1.4 The Proposals

The development comprises the demolition of all of the buildings and structures within the study site and the construction of new development comprising:

Demolition of the existing hospital buildings, accommodation block and associated structures and redevelopment of the site to provide a new care community for older people arranged in two buildings, comprising 267 care residences, 10 care apartments and 28 care suites providing transitional care, together with ancillary communal and support services Use Class C2, 24 key worker units Use Class C3, children's nursery Use Class E, as well as associated back of house and service areas, car and cycle parking, altered vehicular and pedestrian access, landscaping, private amenity space and public open space.

Following refusal of the previous application (reference 19/01722/FUL) and in response to the surrounding heritage and townscape context the overall building heights have been reduced, the buildings fronting Woodcote Green has been set further back allowing increased landscaping area and tree planting and additional landscaping has been added to the sensory garden roof edge. In order to mitigate adverse impact on the surrounding context and views, the tallest parts of the building have been located to the rear of the study site closest to the existing hospital buildings and significantly stepped down towards boundaries with residential areas and the Woodcote Green Road. In addition to this, the elevations, palette of materials and surrounding landscaping have been devised to help the buildings assimilate with the local context and townscape.

1.5 Summary Conclusions

The existing buildings and areas on the study site are poor quality, comprising an *ad hoc* collection of heavily altered buildings and car parking areas, which lack any coherent masterplan. All of the current buildings and structures on the site have been approved for demolition (planning reference 20/01322/DEM).

As a result of the mitigation through design now embedded in the proposals, impact on surrounding townscape and visual receptors has been found in many cases to be none or negligible, with several of the views and townscape areas experiencing no readily discernible change. Other views and townscape areas, which range from low to medium sensitivity would witness minor impacts as a result of additional height and massing, and one view would experience a moderate impact.

The proposals have evolved in response to the surrounding heritage and townscape context; in order to mitigate adverse impact on the surrounding context and views in the following ways:

- The tallest parts of the building have been located to the rear of the study site closest to the existing hospital buildings and stepped down significantly towards boundaries with residential areas and the Woodcote Green Road;
- The buildings have been stepped back from the Woodcote Green Road to allow for additional landscaping and tree planting;
- The building has been designed in an honest, contemporary style, as appropriate given its location adjacent to the wider hospital site which contains

several large-scale modern buildings;

- The palette of materials has been inspired by the local area and the architects have sought to integrate high-quality landscaping, additional trees, planted window boxes and rooftop gardens in order to help to buildings assimilate with their surrounding green setting to the south and to provide an appealing and welcoming place for people to live in and visit.

Given the above it is considered that the proposal satisfies the requirement of NPPF paragraph 127c which requires that developments '*are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)*'. The proposals would have either no impact or a negligible impact on the significance of the majority of the surrounding heritage assets. The exception to this is the Chalk Lane Conservation Area and some of the nearby listed buildings which are likely to experience an adverse impact which we have assessed would be at the low end of the 'less than substantial harm' spectrum. It is anticipated that the application will engage paragraphs 193, 194 and 196 of the National Planning Policy Framework which require any harm to the significance of a designated heritage asset (including from development within its setting) to have clear and convincing justification, the decision maker to weigh the identified harm against the public benefits of the scheme, and for an asset's conservation to be given great weight within that planning balance. The significant and considerable public benefits derived from the scheme are set out in the planning statement accompanying this application and it is considered that these justify the impact of the proposals upon built heritage.

2.0 Built Heritage Site Constraints

The study site does not contain any designated heritage assets, nor does it lie within a conservation area.

The buildings and structures on the site are generally in a poor condition, and are surplus to the requirements of the NHS, hence the sale of the land. Rowan House and the former Laundry relate to the history of the hospital during the first half of the 20th century, and therefore hold a limited level of local historic interest and significance. The tall brick chimney of the former laundry, due to its height is a notable feature and can be seen from several locations in the surrounding area. The historic and architectural interest of the buildings, is however, generally limited due to the amount of alteration that has occurred and their relatively standardised design and construction. Furthermore, none of the buildings on site have been identified by Epsom & Ewell as suitable for inclusion on any local list *and have been approved for demolition (planning reference 20/01322/DEM)*.

Outside of the site, fifty-seven listed buildings/ structures, the Chalk Lane Conservation Area and the Woodcote Conservation Area are located within a 500m search radius. The majority of these heritage assets would not be affected as a result of the site's development due to a lack of intervisibility and a lack of known historical functional association. Those assets which may potentially be affected by the proposals, as a result of changes to their settings, are shown on **[Plate 19]**.

The statutory list descriptions of the listed buildings and structures potentially affected by the proposals are included in Appendix I and a summary of guidance on

the conservation areas provided by the local planning authority is in Appendix II, along with extracts from the relevant legislation and planning policy documents. The Planning (Listed Buildings and Conservation Areas) Act 1990 is the legislative basis for decision-making on applications that relate to the historic environment. Sections 16, 66 and 72 of the Act impose statutory duties upon local planning authorities which, with regard to listed buildings, require the planning authority to 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*'.

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. The development plan applicable to the site comprises the Core Strategy (2007) and Development Management Policies Document (2015).

Policy CS 5 of the Core Strategy requires the Council to protect and seek to enhance the Borough's heritage assets including their settings. It sets out that developments should reinforce local distinctiveness and complement the attractive characteristics of the area. The Development Management Policies include Policy DM8 which requires opportunities for conservation and enhancement of heritage assets to be taken, significance of potentially affected heritage assets to be established. Policy DM9 seeks enhancement of the townscape through new development, particularly those areas with poorer environmental quality and where the character has been eroded or needs improving. Planning permission will be granted for proposals which make a

positive contribution to the Borough's visual character and appearance, considering • compatibility with local character and the relationship to the existing townscape and wider landscape; • the surrounding historic and natural environment; • the setting of the proposal site and its connection to its surroundings; and • the inclusion of locally distinctive features and use of appropriate materials. Policy DM 10 requires new developments to respect, maintain or enhance the most essential elements identified as contributing to the character and local distinctiveness of a street or area. Similarly Policy DM 11 requires that proposals for new housing demonstrate how the density of development would contribute towards maintaining and enhancing the visual character and appearance of the wider townscape.

The courts have held that following the approach set out in the policies on the historic environment set out in the National Planning Policy Framework (2019) will effectively result in a decision-maker complying with its statutory duties. The Framework forms a material consideration for the purposes of section 38(6). At the heart of the Framework is '*a presumption in favour of sustainable development*' and there are also specific policies relating to the historic environment. Paragraph 127c of the NPPF states that planning policies and decisions should ensure that developments '*are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)*'. This is a key paragraph to consider in relation to the current application.

The Framework states that heritage assets are ‘an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations’. The Glossary to the National Planning Policy Framework defines a heritage asset as:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

The Framework, in paragraph 189, states that:

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Section 5 of this report – the assessment of significance – meets this requirement and is based on the research and site surveys presented in sections 3 and 4, which are of a sufficient level of detail to understand the potential impact of the proposals on the significance of the assets. Whilst there is no statutory recognition of the ‘setting’ of a conservation area, it is widely accepted that paragraph

189 does encompass what may be significant about the setting of conservation areas, and we have duly undertaken assessments pursuant to this.

The Framework in paragraph 193, also requires that:

When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

The Framework goes on to state at paragraph 194 that:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.

Section 8 of this report sets out this clear and convincing justification.

The Framework requires that local planning authorities categorise harm as either ‘substantial’ or ‘less than substantial’. Whilst our assessment has concluded that the development would not cause substantial harm to any of the designated heritage assets, it is noted that where a proposed development would lead to ‘substantial harm to (or total loss of significance of) a designated heritage asset’, the Framework states, in paragraph 195, that:

... local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

Where a development proposal will lead to ‘less than substantial harm’ to the significance of a designated heritage asset, the Framework states, in paragraph 196, that:

...this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

The Framework requires local planning authorities to look for opportunities for new development within conservation areas and within the setting of heritage assets to enhance or better reveal their significance. Paragraph 200 states that:

Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Concerning conservation areas and world heritage sites it states, in paragraph 201, that:

Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

3.0 Historical Background

3.1 Development of Epsom

Epsom grew from a small 10th century settlement and derives its name from the original Saxon landowner, 'Ebba'. By 1086, its name had evolved to 'Evesham' and the small village had grown to 38 households grouped around the original church of St Martin and two mills, located half a mile south-east of modern day Epsom. In the 11th century, the settlement was under the ownership of Chertsey Abbey, who owned the majority of north-west Surrey at this time, and grants of land in Epsom were made to the abbot in 1338 by Peter atte Mulle and Richard de Horton.¹ This land would develop into Epsom High Street. Records created as part of the dissolution of the monasteries in 1537 show that Epsom's main industrial output was agricultural, although brick-making became steadily important. Dorking Road, which runs through the centre of Epsom, formed the main carriageway between London and Dorking to the south-west.

In 1618, the discovery of magnesium sulphate in the local spring on Epsom Common (now the 'Old Well') led to the development of Epsom as a spa town.² A Dutch artist, Willem Schellinks, visited Epsom in the mid-17th century and wrote:

*Epsom is a very famous and much visited place, very pleasant, and that because of the water which lies not far from there in a valley, which is much drunk for health reasons, having purgative powers [...].*³

New inns and lodgings, such as the White Horse Public House (c.1690s), the Albion Inn (c.1700) and the Spread Eagle Inn (c.1700) and others sprang up as demand for drinking medicinal waters rose. Given it was only 18 miles from the capital and much nearer than other spa towns like Tunbridge Wells, the area became a popular country retreat for Londoners in hot summers when the mineral concentration of the water was higher. The Lord of the Manor, John Pankhurst, built a new well house in 1707 in brick as the spa operation became commercial, and this was followed by the establishment of coffee houses, 'gameing' rooms and shops selling 'sweetmeates'.⁴ At the same time, development in the town was spurred by the establishment of Epsom races, possibly as early as the 1640s, which has continued to this day.

By the 18th century, Epsom's status as a fashionable spa town – with a dedicated daily post run to London from 1684 – had created a mercantile class that had settled there with their families. Large mansion houses and estates were established south-west of Epsom, most notably the Hylands (c.1720s) – a large country house – the Durdans (built 1764-8 by William Newton) – a country estate – Woodcote Grove (c.1690s) and Woodcote House (built by Sir Edward Northey). These estate houses tended to be five to seven bays wide and included neo-classical detailing that imitated styles established in London. White stone and timber, particularly for the Durdans, appears to have been sourced from nearby Ewell where the crumbling Nonsuch Palace supplied much of the material.⁵ Tell-tale white quoins and other architectural embellishments on houses south-west of Epsom therefore suggest that they

were part of this building period. Although the popularity of 'taking the water' of Epsom had dwindled by the mid-18th century, having been overtaken by Bath, the Epsom Derby grew in popularity and was joined by 'gambling, cudgel-playing, foot-races, cock-fighting, and catching a pig by the tail' towards the end of the 18th century.⁶ As the town grew, smaller houses, such as 10 Woodcote Road, were built. This class of building, generally built south-west of Epsom, often included stables at the rear and a large quantity appear to have been constructed between 1710 and 1750.⁷

The present streetscape of Epsom began to take shape in the early-19th century. As London expanded, Epsom was subsumed within the London County Council remit and further residential streets were laid out. Epsom Common Fields, to the south-east of Epsom, were enclosed by an Act of Parliament in 1865, which spurred further development. Following in the wake of Epsom's historical standing as a place of recovery, the area was selected as the location for a series of new psychiatric hospitals, known as the 'Epsom Cluster', designed by London County Council architects George Thomas Hine and William C. Clifford-Smith between 1896 and 1907. These included the Manor Hospital (1896-9), Horton Hospital (1902), St Ebba's Hospital (1904), West Park Hospital (1906-17) and Long Grove Hospital (1907) and all were designed to alleviate the pressure on London's psychiatric hospitals. Between 1910 and 1940, a huge array of residential streets, crescents and cull-de-sacs were laid out across Epsom, which were bolstered by post-war construction in the 1950s.

1 <https://www.british-history.ac.uk/vch/surrey/vol3/pp271-278>

2 Cherry, p. 216.

3 Surrey Archaeological Society, p. 77.

4 <http://www.epsomandewellhistoryexplorer.org.uk/EpsomSpa.html>

5 Woodcote Conservation Area Appraisal.

6 <https://www.british-history.ac.uk/vch/surrey/vol3/pp271-278>

7 Cherry, p. 219.

In 1973, the area to the south-east of Epsom, between Epsom Town Centre and the Epsom Downs Race Course, was designated as the Chalk Lane Conservation Area. This area retains many of its 17th- and 18th-century buildings constructed during the spa era (see above) and historical equestrian buildings connected to the Epsom Racecourse. In 1982, the area to the north-east, leading into the centre of Epsom, was designated the Woodcote Conservation Area. In a similar vein to Chalk Lane, the Woodcote Conservation Area retains many large estates and manor houses which date from a time when Epsom was a budding spa town with a seasonal wave of visitors who required seasonal accommodation.

3.2 History of the Epsom Hospital Site

Prior to 1836 the Epsom Poor House (later known as the Epsom Workhouse) occupied part of the wider Epsom Hospital Site. It is unclear exactly when this workhouse was first built, but it formed part of series of workhouses in Surrey (including nearby Ashted, Ewell, Banstead and Chessington) that administered care for the poor and destitute and had capacity for up to 100 paupers. The quality of care appears to have been called into question in the summer of 1779, however, when a vestry panel reported:

*We found the Children nearly in a State of Nakedness, most part of them without Stockings or Hose, dirty, lousey, and in a very wretched Condition.*⁸

The Epsom Union was formed in May 1836, as part of the wider reforms of the Poor Law championed by the Royal Commission on the Poor. The Union closed most of the Surrey parish workhouses, including the existing Epsom Workhouse and issued a call for designs for a new centralised workhouse to accommodate the needs of all the parishes, to be located on a plot of land to the rear of the original Epsom workhouse (to the north of the study site).⁹ The Union accepted the designs of William Mason of Ipswich for a double-cross plan ‘in the Tudor style’ and construction began on the 12th October 1836.¹⁰ The new building, **[Plate 2]** was considerably larger than the previous Epsom parish workhouse and had capacity for

up to 300 paupers. On 21st March 1839 the workhouse was completed and work to furnish the building began, at a total cost of £150.

The 1838 Epsom Tithe Map and apportionment show the recently constructed Epsom Union Workhouse occupied a roughly rectangular plot to the north of the study site boundary **[Plate 3]**. The building with a H-shaped plan to the immediate north of the new building was likely the former workhouse captured in J. Hassell’s illustration. The large new building made provision for a variety of light industrial workhouse tasks, including the crushing of glass into powder with pestle and mortar, the processing of corn and barley, oat and pea cracking and the mending of shoes and laundry work. On the 1838 map, the study site comprised a series of smaller plots, with houses facing onto the road and gardens behind. The Woodcote Green with an oval pond was shown on the opposite site of the road, beyond which was Woodcote House. Further parcels of ribbon development were shown along the Dorking Road and Woodcote Green Road, with a greater concentration of buildings located around road junctions to the east. The surrounding buildings were a collection of large, detached properties set within generous grounds and smaller clusters of cottages. The land to the immediate east and west of the workhouse and site remained undeveloped meadow land and gardens at this time.

The workhouse’s success prompted various extensions and alterations to increase capacity and to add new functions throughout the 19th century, including stables, a new infirmary building, a ‘casuals ward’, a chapel and a mortuary. At the end of the first year the Board purchased a corn mill on which six to twenty men could work at once

grinding corn or barley, and in 1840 a mill house was erected to house this work.¹¹ The 1866 Ordnance Survey **[Plate 4]** shows that an entrance lodge had been added next to the entrance driveway at Dorking Road, additional buildings (possibly the aforementioned stables) had been added to the north and the workhouse footprint had been expanded. Additional small buildings are also shown to the east and west of the workhouse plot. The study site remained occupied by one detached building identified on this map as Stone House, with a rear garden planted with trees and a series of other more modest, and in part, terraced residences.

A ‘casuals ward’ was constructed to the north-east of the workhouse plot in 1872, followed in 1879 by a new chapel. In 1882 a large detached ‘pavilion style’¹² infirmary was built upon the former meadow land to the east, to designs by Herbert D. Appleton of Sutton and the boardroom and offices were enlarged and in 1885 a new mortuary was added¹³. All of these additions are evident on the 1897 Ordnance Survey **[Plate 5]**, as is the addition of a small collection of buildings set around a U-shaped courtyard plan, built within the meadow land to the east and the enlargement (or replacement) of the Stone House within the study site, which is shown with a longer and narrower footprint. In 1897 tenders were sought for the erection of a separate laundry building.

8 White, p. 26.

9 The Times, 2 July 1836 and The Epsom and Ewell Advertiser 11 August to 8 September 1927

10 Imperial Gazette of England and Wales, 1 October 1836.

11 The Epsom and Ewell Advertiser 11 August to 8 September 1927

12 In architectural terminology a pavilion refers to a subsidiary building that is either positioned separately or as an attachment to a main building.

13 <http://www.epsomandewellhistoryexplorer.org.uk/WorkhouseEpsom.html>

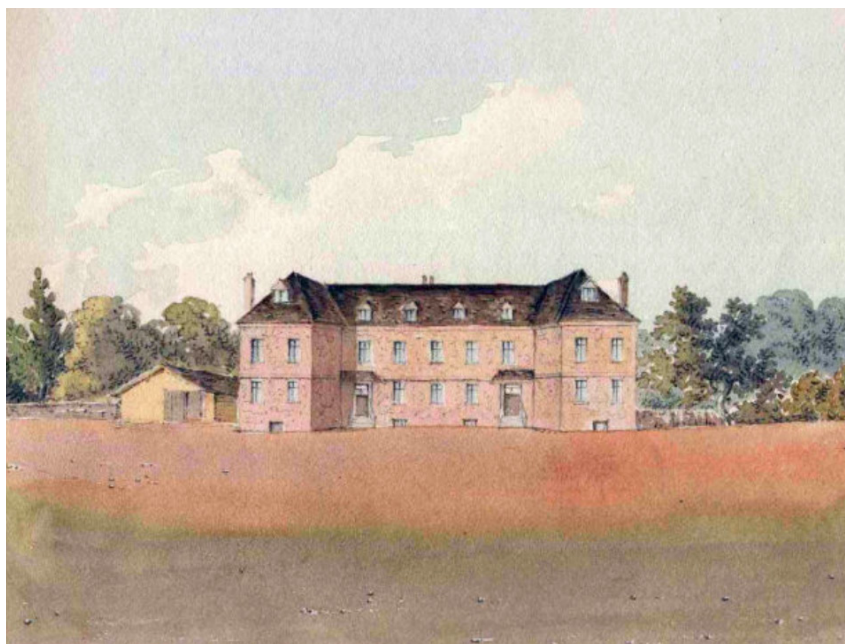


Plate 1 Painting of Epsom Workhouse by J Hassell, 1823, Bourne Hall Museum



Plate 2 Epsom Union Workhouse by William Mason (architect), c. 1836, Epsom and Ewell History Explorer



Plate 3 1838 Tithe Map of Epsom © Crown Copyright Images reproduced by courtesy of The National Archives, London, England. www.NationalArchives.gov.uk & www.TheGenealogist.co.uk

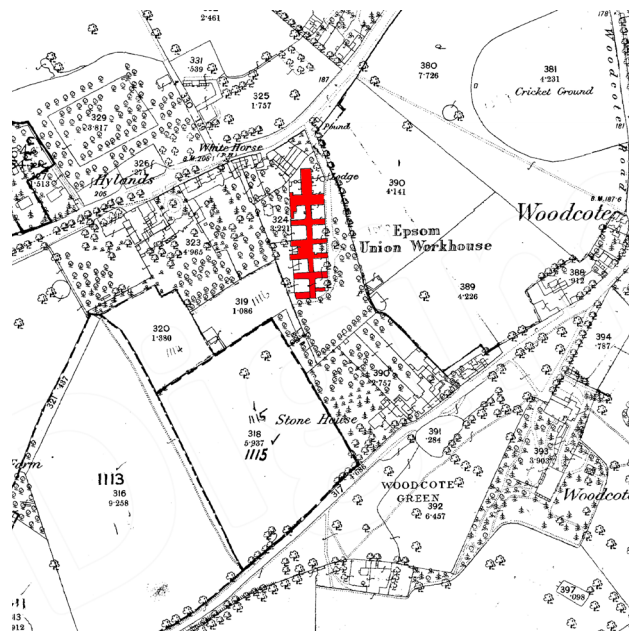


Plate 4 1866 OS map, with William Mason's Epsom Workhouse marked in red, Library of Scotland

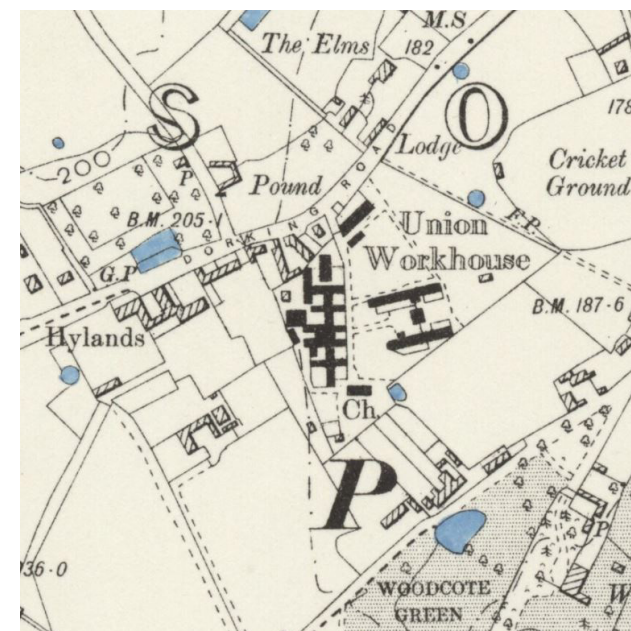


Plate 5 1897 OS map, with site marked in red, Library of Scotland

By 1911, **[Plate 6]** the workhouse complex had continued to expand with additional buildings located to the south of the original workhouse, including a separate laundry.¹⁴ By this point, the neighbouring fields to the east had been converted into sports pitches, including a cricket pitch and tennis ground with pavilion, and the former meadows to the west have been developed for housing.

In 1919 Poor Law administration was relocated under the Ministry of Health and the workhouses of the 19th century around the country began to either dissolve or be converted into hospitals, the latter being the case at Epsom. In 1930 the workhouse system was formally abolished and replaced with more suitable social legislation that pre-dated the formation of the National Health Service. Between 1911 and 1932 **[Plate 7]**, the large infirmary building was expanded southwards with a new hospital wing, a separate mortuary was built to the east and the majority of the surrounding land, particularly to the north of Dorking Road and to the east of the study site, was infilled with streets of residential development.

Between 1937 and 1938 the buildings contained within the study site, lining Woodcote Green Road (save for western most building) were demolished to make way for a new nurses' home and ancillary accommodation, which was attached to the remaining building to the west.¹⁵ In 1948, the site was acquired by the newly established National Health Service and henceforth the site was known as Epsom District Hospital. By 1950 **[Plate 8]** further infill development had occurred to the north of Woodcote Green Road and a new hospital, known as

St Helier Hospital, was also constructed south of the original infirmary building. An additional building had also been built to the south of the earlier laundry, and was presumably an additional laundry facility due to the inclusion of a large chimney (this building remains extant within the site although the earlier, nineteenth century laundry has been demolished).

Since 1950 the complex has continued to expand, the original workhouse building has been replaced and the building on site, in the location of the former Stone House, appears to have been detached from the adjacent Nursing Home and completely rebuilt. The surrounding areas have been developed for housing, such that the once edge of settlement study site has become fully subsumed within built form and urban recreational spaces. . In 1971 a new building by the architects Mayorcas Guest & Partners was constructed (images of which can be found: <https://www.architecture.com/image-library/ribapix/image-information/poster/epsom-hospital-dorking-road-epsom-surrey/posterid/RIBA57828.html>). In 1977, the Accident & Emergency department on the St Helier's side of the site was opened and this was joined ten years later by a new maternity unit. More recently a large portion of the main hospital buildings were rebuilt after planning permission was granted in July 1993 for the construction of four new buildings and a new car park. Planning permission was granted to rebuild two further historical ward buildings (the Elizabeth and Nightingale wards) in July 1997. Various minor alterations have taken place in the hospital since 1997.

14 The Builder, 10 April 1897.

15 The Builder, 12 November 1937.

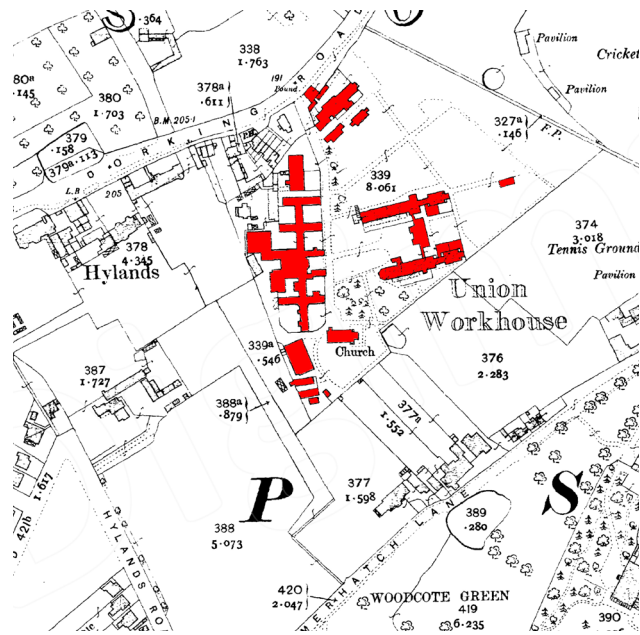


Plate 6 1911 OS map, with site marked in red, Library of Scotland

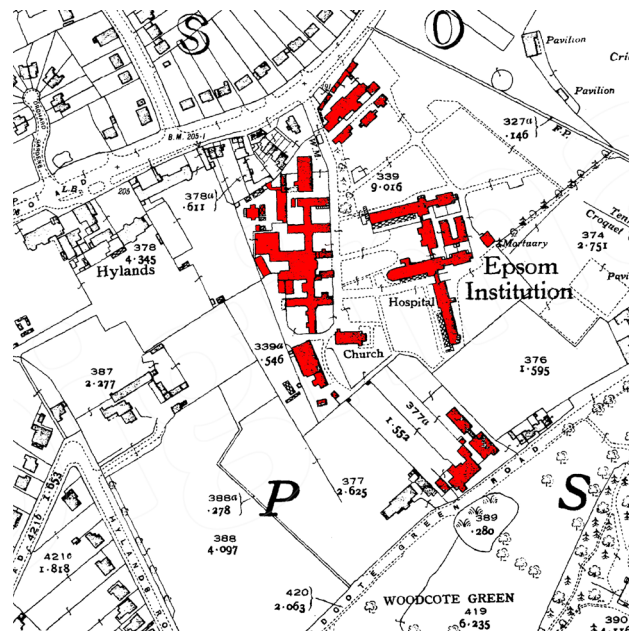


Plate 7 1932 OS map, with site marked in red, Library of Scotland

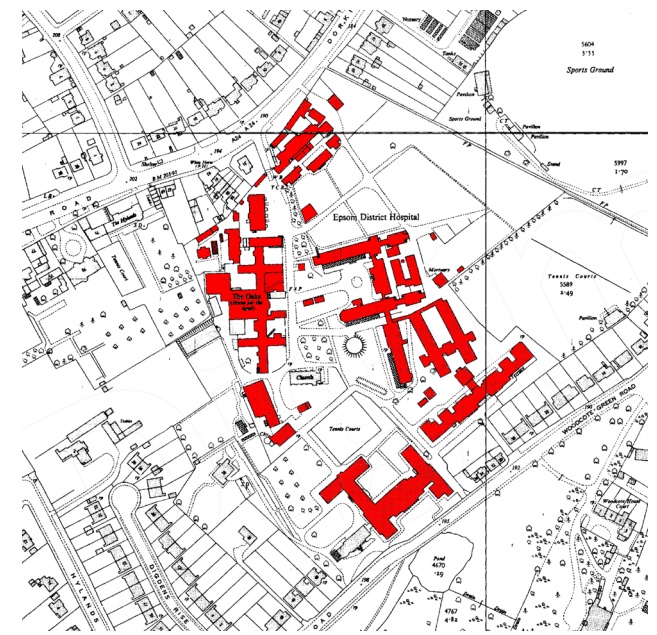


Plate 8 1950 OS map, with site marked in red, Library of Scotland



Plate 9 Epsom workhouse exterior photographed in c1950, Bourne Hall Museum



Plate 10 Epsom workhouse interior photographed in c1950, Bourne Hall Museum

3.3 Relevant Planning Records

93/00223/FUL July 1993 Permitted
Demolition of buildings and construction of 2 no. four storey buildings, 2 no. three storey buildings, car parking and re-siting of 2 temporary buildings.

93/00724/FUL April 1994 Permitted
Erection of 5 residential buildings to provide 67 self-contained flats and ancillary accommodation, with associated car parking areas, and alterations to access arrangements.

94/00109/FUL April 1994 Permitted
Change of use of first, second & third floors from residential accommodation to ancillary offices; partial demolition of existing wing and alterations to existing building.

95/00799/FUL March 1996 Permitted
Erection of 5 residential buildings to provide 69 self-contained flats & 18 en-suite service rooms & ancillary accommodation, associated car parking & amenity space, & alterations to existing access arrangements. (Revised Plans to earlier.

97/00329/FUL July 1997 Permitted
Demolition of existing ward buildings (Elizabeth & Nightingale) & erection of a four storey building to provide replacement ward & ancillary therapy accommodation together with single storey ancillary plant room and formation of new car park.

97/00865/FUL February 1998 Permitted
Erection of roof extension over existing second floor terrace to form an integrated education centre for use as post registration & post graduate accommodation, library, conference rooms and ancillary accommodation for staff.

99/00781/FUL April 2000 Permitted
Erection of prefabricated building adjacent Rowan House for use as social service offices.

99/00782/FUL November 1999 Permitted
Erection of single storey extension & canopy, in connection with use of the main building (Denbies Wing) as accident & emergency unit, including ambulance waiting area & 18 new car parking spaces.

02/00927/FUL February 2003 Permitted
Erection of single storey extension to York House in connection with the use of the building as a day nursery for children of hospital staff

02/01474/FUL March 2003 Permitted
Demolition of existing buildings and extension of pay and display car park

10/00876/FUL February 2011 Permitted
Single-storey extension and alteration to existing endoscopy day-case unit.

16/00719/FUL October 2016 Permitted
Erection of 2No glass curtain wall link corridors with 5 degree roof. Alterations to existing doors and windows to suite new layout. Landscaping to Fenby Ward, level existing secure garden, lay half with new Astro Turf and creation of play area.

18/00990/FUL December 2018 Permitted
Proposed extension to accommodate new bed lift

19/01722/FUL November 2020 Refused
Demolition of the existing hospital buildings, accommodation block and associated structures and redevelopment of the site to provide a new care community for older people arranged in two buildings, comprising 302 to 308 care residences, 8 to 12 care apartments and 26 to 30 care suites providing transitional care, together with ancillary communal and support services Use Class C2, 24 key worker units Use Class C3, childrens nursery Use Class D1 as well as associated back of house and service areas, car and cycle parking, altered vehicular and pedestrian access, landscaping, private amenity space and public open space.

20/01322/DEM October 2020 Permit Prior Approval
Demolition of the existing buildings and structures on site.

3.4 Sources and Bibliography

RIBA

Journal Collection

Library of Scotland

Historic OS Maps

London Metropolitan Archive

Historic Photo Collection

Historic England

Red Box Collection

Historic Photo archive

Bourne Hall Museum

Paintings

British Newspaper Archive

The Epsom and Ewell Advertiser

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The Times

Published Sources

Cherry, B., Pevsner, N., and Nairn, I. *The Buildings of England: Surrey*, 2nd edn (London: Penguin Books Ltd, 1971)

Epsom Council, Woodcote Conservation Area Appraisal (Epsom: August 2010)

Epsom Council, Chalk Lane Conservation Area Appraisal (Epsom: August 2010)

Surrey Archaeological Society, Surrey Archaeological Collections, Relating to the History and Antiquities of the County, vol. 76-8 (London: University of California, 1985)

White, T. and Harte, J., *Epsom – A Pictorial History* (London: Phillimore, 1992)

4.0 Site Survey Descriptions

4.1 The Site

The study site is located to the south of the Epsom General Hospital site, south west of Epsom Town Centre, in Surrey. It is positioned to the north of Woodcote Green Road and is centred on national grid reference TQ204597. It is a predominantly flat site with the surrounding land gently and steadily rising to the south towards the North Downs.

The study site, which would be entirely cleared and redeveloped by the proposals, is currently occupied by a surface carpark and a variety of buildings and structures ranging from single-storey pre-fabricated buildings to large four-storey brick buildings [see plates 11 - 18] with associated infrastructure. The site is in a poor condition and all of the buildings are now surplus to requirements by the NHS, hence the sale of the land. The existing site lacks visual amenity, comprising an *ad hoc* collection of building with a haphazard and incoherent masterplan. The buildings and structures within the study site range in date from those constructed in the 1930s to those constructed in the late 20th century. The southern edge of the site is partially lined with trees which screen some of the buildings within.

Situated within the study site, Rowan House lies adjacent to Woodcote Green Road behind a surface carpark, which was built between 1937 and 1938 and is four storeys tall with a hipped roof. The building has an H-shaped plan form (with later additions) and is built of brick laid in English bond with gauged brickwork above the window and door openings. Each elevation has regular rows of six-over-six sash windows with elongated nine-over-nine sash windows at ground

floor level. Part of the eastern end of the building has different fenestration and may comprise an earlier nineteenth century building that was incorporated within the new building in the 1930s.

1-24 Woodcote Lodge is a detached three-story building including mansard roof, located to the west of Rowan House and set back from Woodcote Green Road by a surface carpark. The brick building is understood to have been built during the late 20th century and has no architectural or historical interest.

To the rear of these buildings is a surface carpark and a service road, beyond which lies a collection of predominantly modern service structures, and a brick building with a tall chimney, presumed to be the former laundry which was built between 1938 and 1950. This is a two-storey building, built of red brick with blue brick detailing to the base of the wall and around a large arched opening and smaller flat headed doorway on the south elevation. The building has a curved eastern corner and tall chimney. The window openings have concrete lintels and cills and the ground floor is dominated by large grilles.

York House is a detached building used by the research and education department, located within the north east corner of the study site and surrounded by areas of hardstanding and car parking. It was built between 1932 and 1938, has two stories under a tiled and hipped roof with two chimney stacks. It is built of red brick laid in stretcher bond, sash windows set under soldier course brick lintels and a front door with a fanlight and pediment over.

All of the current buildings and structures on the site have been approved for demolition (planning reference 20/01322/DEM).



Plate 11 Looking north east across the study site



Plate 13 Rowan House



Plate 12 1-24 Woddcote Lodge



Plate 16 View looking south towards the study site



Plate 14 Rear of Rowan House



Plate 15 Building in the north western half of the study site used for research purposes



Plate 17 1930s building within the study site



Plate 18 Ad hoc collection of building on the wider hospital site

5.0 Identification of Heritage Assets and Assessment of Significance

5.1 Introduction

The purpose of this section is to identify and establish to significance of the heritage assets within the surrounding area which could be affected by the proposed development. It provides an assessment of their significance, so that the proposals for change are fully informed and the effect of the proposals upon that significance can be evaluated. This assessment responds to the requirement of the National Planning Policy Framework to 'recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance'. The NPPF defines significance as;

'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological (potential to yield evidence about the past), architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'.

5.2 Identification of heritage assets

The study site does not contain any built designated heritage assets nor does it lie within a conservation area.

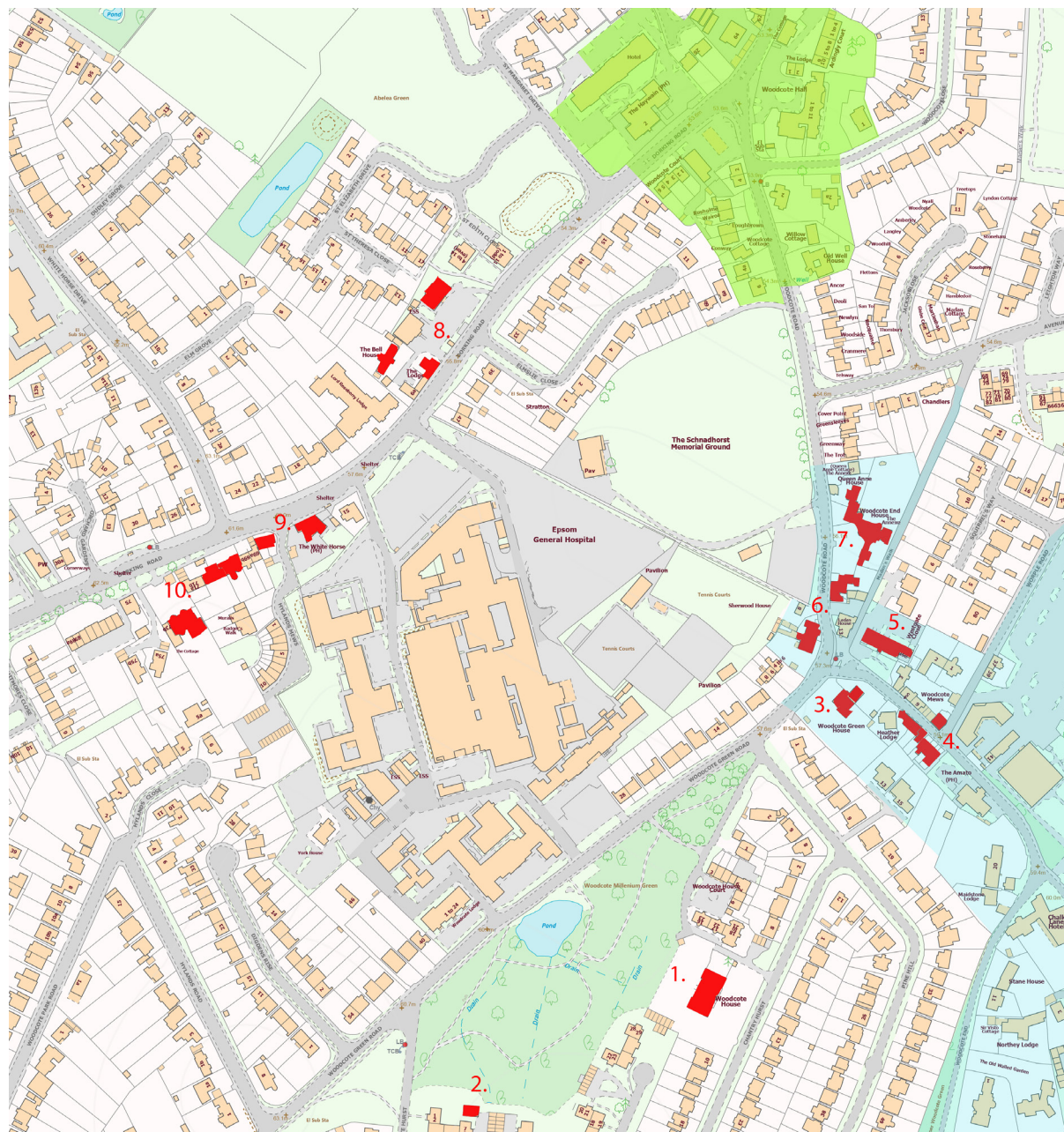
As outlined in Section 1.2 of this report, while Rowan House and the former Laundry have some limited historic and architectural interest, this has been compromised by later alterations and changes to the building, and it is therefore considered that the significance of these buildings is not great enough for these structures to be considered 'non-designated heritage assets'. *All of the*

current buildings and structures on the site have been approved for demolition (planning reference 20/01322/DEM).

Outside of the site, 57 listed buildings/structures, the Chalk Lane Conservation Area and the Woodcote Conservation Area are located within a 500m search radius of the site, alongside a number of assets identified by Epsom & Ewell Borough Council as locally listed (i.e. considered non-designated heritage assets), whose significance could be affected as a result of changes to their settings. Historic research and a site visit has been used to verify which heritage assets, out of those initially identified, could be affected by the proposals and how this would impact on their significance. Due to a lack of intervisibility and a lack of historic functional association, it has been concluded that the significance of the majority of these heritage assets would not be affected as a result of the site's development.

Those heritage assets which are considered to potentially to be affected by the proposals, either due to their close proximity, intervisibility and/ or shared historic association are shown on **[Plate 19]** and include:

- Chalk Lane Conservation Area (including locally listed and positive buildings identified within it)
- Woodcote Conservation Area (including locally listed and positive buildings identified within it)
- Barn behind Nos 1 & 8 (Axwood) Grade II List UID: 1288643
- Woodcote House Grade II List UID: 1214288
- Woodcote Green House Grade II* List UID 1214289
- Westgate House Grade II List UID: 1028573
- Woodcote Villa Grade II List UID: 1288656
- 10 Woodcote Road Grade II List UID: 1214353
- 9 & 11 Woodcote Road Grade II List UID: 1288645
- Service Block to Westcote End House Grade II List UID: 1214352
- Queen Anne House and Woodcote End House Grade II* List UID: 1288644
- 2 and 4 Chalk Lane Grade II List UID: 1028577, 6 Chalk Lane Grade II List UID: 1378219, 8 and 10 Chalk Lane Grade II List UID: 1028578, 12 and 14 Chalk Lane Grade II List UID: 1378220, 5 Chalk Lane Grade II List UID: 1028574,
- Stable Block to Woodcote Grove Grade II List UID: 1028575
- Clock House, Grade II List UID: 1044742
- The Bell House Grade II List UID: 1246206
- East lodge to south west of clock house lodge to south west of clock house Grade II List UID: 1246205
- The White Horse Public House Grade II List UID: 1232220
- 67-69 Dorking Road Grade II List UID: 1378248
- The Hylands Grade II* List UID: 1044739
- Hylands House Grade II* List UID: 1044740 and West Hylands Grade II List UID: 1378249



- Chalk Lane Conservation Area
- Woodcote Conservation Area
- Listed Building Assessed in HTVIA

1. Woodcote House Grade II List UID: 1214288
2. Barn behind Nos 1 & 8 (Axwood) Grade II List UID: 1288643
3. Woodcote Green House Grade II* List UID 1214289
4. Nos 2 and 4 Chalk Lane Grade II List UID: 1028577, 6 Chalk Lane Grade II List UID: 1378219, 8 and 10 Chalk Lane Grade II List UID: 1028578, 12 and 14 Chalk Lane Grade II List UID: 1378220, 5 Chalk Lane Grade II List UID: 1028574, and and Stable Block to Woodcote Grove Grade II List UID: 1028575
5. Westgate House Grade II List UID: 1028573
6. Woodcote Villa Grade II List UID: 1288656, 10 Woodcote Road Grade II List UID: 1214353, 9 & 11 Woodcote Road Grade II List UID: 1288645 and Service Block to Westcote End House Grade II List UID: 1214352
7. Queen Anne House and Woodcote End House Grade II* List UID: 1288644
8. Clock House, Grade II List UID: 1044742, The Bell House Grade II List UID: 1246206, East lodge to south west of clock house lodge to south west of clock house Grade II List UID: 1246205
9. The White Horse Public House Grade II List UID: 1232220 and 67-69 Dorking Road Grade II List UID: 1378248
10. The Hylands Grade II* List UID: 1044739, Hylands House Grade II* List UID: 1044740 and West Hylands Grade II List UID: 1378249

Plate 19 Plan Showing Assessed Heritage Assets

5.3 Statement of Significance

5.3.1 Chalk Lane Conservation Area (including locally listed and positive buildings identified within it)

The Chalk Lane Conservation Area was designated in 1973, and is considered one of Borough's most important conservation areas due to the relatively high number of Grade II* listed buildings and its semi-rural setting with the Epsom Downs which gently rises to the east and south, and provides a sense of rurality, otherwise unusual for Epsom. The Conservation Area contains a variety of building types, including polite, grand residences set within private grounds and parkland (and with service buildings such as stables which attest to the areas link with horse racing) and modest vernacular cottages. High, red brick walls also contribute to the character and appearance of the area. Many of the buildings relate to the development of Epsom as a Spa Town from the 17th century onwards and the famous Epsom Race Course.¹⁶

The Conservation Area has a varied and contrasting, semi-rural setting made up of Epsom Town Centre to the north, sports pitches/grounds, the hospital site and surrounding suburban post-war development to the west, and the rural, wooded landscape of Epsom Downs Race Course to the east and south. The Conservation Area Townscape Appraisal Map **[Plate 20]** identifies key views from and towards the Conservation Area. The majority of these views look away from the site towards the surrounding rural landscape to the east and south, as this is the part of the asset's setting which makes the most valuable contribution to the significance of the area;

it contributes to the visual and sensory experience of the asset and illustrates the historic association between the private residences with large stables and the famous racecourse. The northern part of the Conservation Area relates more, visually and historically, to the built form of Epsom, and particularly to the Woodcote Green Road and Chalk Lane junction around which the properties were developed. A view towards this junction (shown on plate 20) from the Woodcote Green Road is noted as an important view, and contains a combination of historic buildings set around the junction. From the publically accessible parts of the conservation area incidental views to the north and west contain elements of existing, large-scale hospital buildings located to the north of the study site, as well as mid-20th century residential housing and sports grounds.

Due to intervening built form, vegetation and topography, the study site is not visible from views within the majority of the Conservation Area. However views of the wider hospital site are obtained from the northern end of the designated area. The large scale buildings already present on the wider hospital site largely screen the study site at present, however the tall chimney stack belonging to the former laundry is visible. Views towards the study site from the western edge of the Conservation Area along Woodcote Green Road contain views of the verdant Millenium Park to the left, residential properties lining the road to the right, with the side elevations and roofscape of the existing 1930s building and tall brick chimney within the study site visible beyond, however the other buildings on the site are not visible in this view **[Plate 22]**.

The significance of the Chalk Lane Conservation Area is primarily derived from the historic and architectural group value of the historic properties within the area, the morphology of the settlement which largely relates to ribbon development along the roads and its semi-rural setting to the south and east. Given the limited intervisibility with the study site, it is considered that at present, the study site makes a no contribution to the significance of the conservation area and no contribution to its character and appearance.

16 Epsom & Ewell Borough Council, Chalk Lane Conservation Area Appraisal (2010)

Plate 20 Chalk Lane Conservation Area Townscape Map

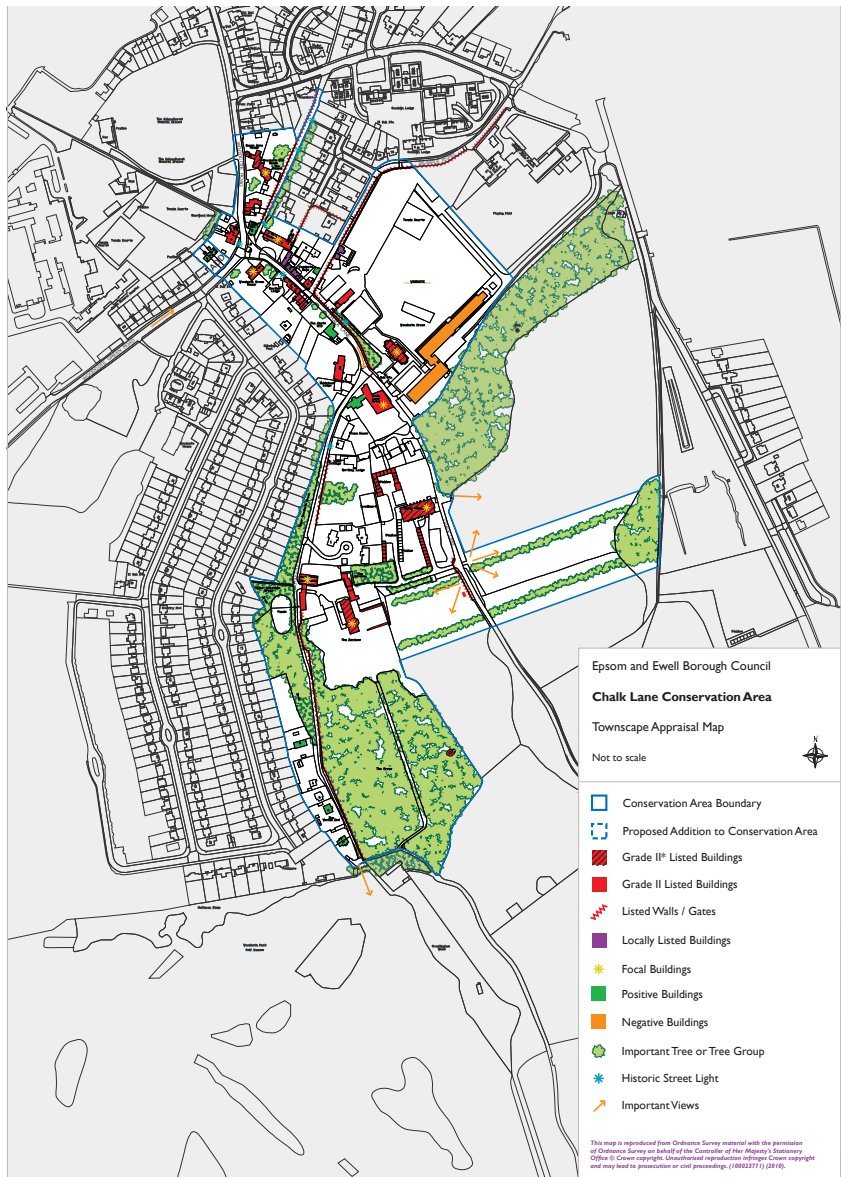


Plate 21 View towards study site from junction



Plate 22 View towards study site from boundary of Conservation Area

5.3.2 Woodcote Conservation Area (including locally listed and positive buildings identified within it)

The Woodcote Conservation Area was designated in 1982 and is located immediately south of the historic settlement of Epsom. The area developed from the late 17th century in line with the growing status of Epsom as a spa town. The Conservation Area is centred on the junction between South Street, Woodcote Road and Dorking Road. The Conservation Area is made up of a variety of building types ranging from 17th century cottages, polite 18th century private residences to 19th century Public Houses. The key characteristics of the Conservation Area, are identified within the Conservation Area Appraisal as follows:

- Modestly sized urban conservation area located just to the south of Epsom Town Centre Conservation Area, and focused on the busy junction of South Street with Woodcote Road and Dorking Road;
- The more rural Chalk Lane Conservation Area lies close by with its outstanding collection of prestigious 17th century houses;
- Varied building lines and plot sizes;
- There are four listed buildings, some arranged in groups, plus a listed boundary wall: Woodcote Hall, a substantial stuccoed mid-18th century, now converted into apartments; The Haywain Public House, another slightly smaller stuccoed house dating to the early 19th century; Two groups of 17th or early 18th century cottages - Nos. 73 and 75 South Street and Nos. 58-62 South Street (Abele Cottages); Substantial brick walls relating to the former kitchen garden to Woodcote Hall are a feature along Woodcote Road and are also listed grade II;

- A number of late 19th century detached or semi-detached cottages along South Street which although not listed, are considered to be 'positive' in their contribution to the character of the conservation area;
- The Queen's Head Public House, a well detailed late 19th century inn on a prominent site;
- Further early 19th century stuccoed houses in Woodcote Road;
- The use of red brick, white-painted stucco, clay handmade tiles, natural slate, varied window types including both sashes and casement, and some interesting front door details;
- A variety of modern buildings, mainly neutral in their impact apart from the petrol-filling station on the main road junction.

The Woodcote Conservation Area has an entirely urban setting; largely surrounded by inter-war or later residential development. Epsom Town Centre lies to the north, the Chalk Lane Conservation Area lies to the south-east with a combination of 1930s residential properties, the historic Clock House, Bell House and East Lodge to the west beyond which lies sports grounds and the wider hospital site. It has been proposed to alter the existing boundary of the Conservation Area (see plate 23) however this assessment is based on the adopted boundary at present.

Views within the Conservation Area are inward looking and are limited to short vistas along the streets, which terminate in buildings of varied value including the low quality, modern petrol-filling station (important views are identified on the Conservation Area Townscape

Appraisal Map **[Plate 23]**). Views northwards along South Street terminate with the large modern office buildings that mark the beginning of Epsom Town Centre. No views looking towards the site are identified on the map. Views of the study site from the southern boundary of the conservation area include the tall buildings contained within the hospital site, however the study site itself is not apparent and predominantly hidden behind other built form **[Plates 24]**.

The significance of the Conservation Area is principally derived from the collection of historic buildings which have architectural and historic interest and inward looking views. Due to limited intervisibility, at present, the study site is considered to make no contribution to the significance of the conservation area and no contribution to its character and appearance.

Plate 23 Woodcote Conservation Area Townscape Map

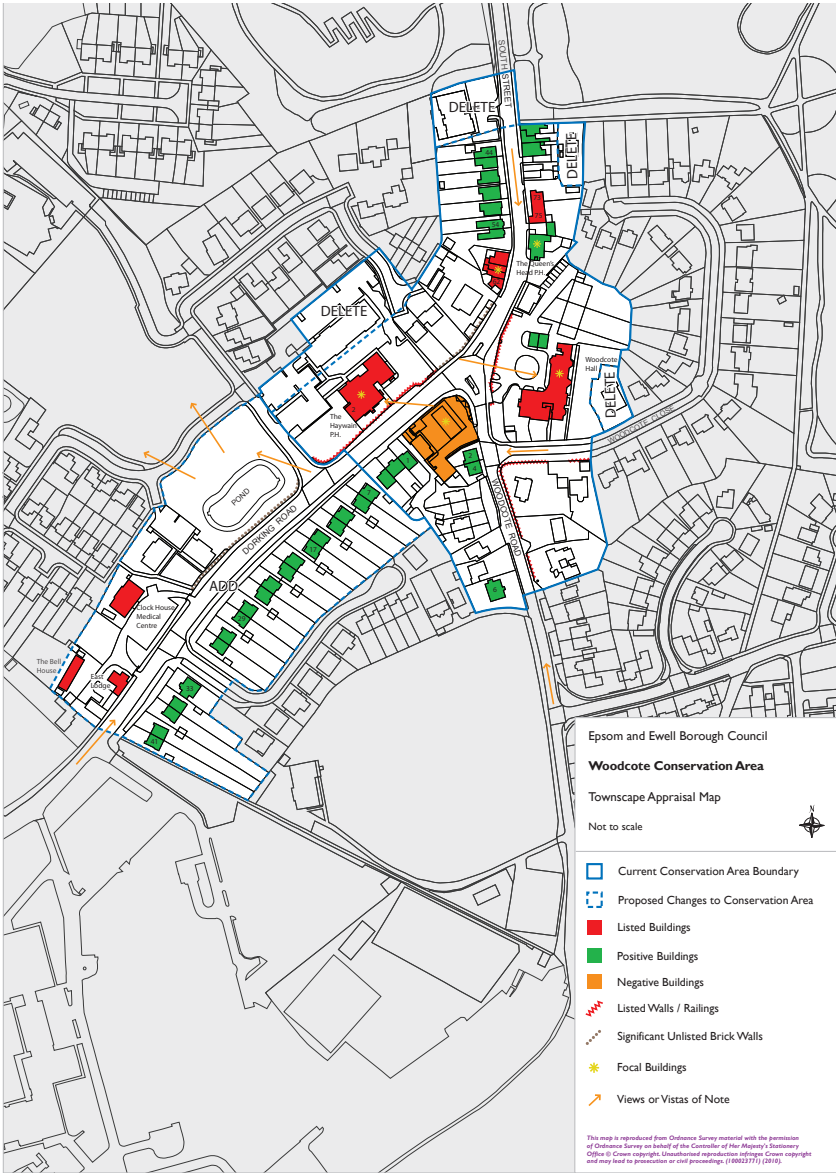


Plate 24 View towards the study from southern boundary of Conservation Area

5.3.3 Woodcote House (Grade II Listed) & Barn behind Nos 1 & 8 (Axwood) (Grade II Listed)

These two designated heritage assets are both listed at Grade II and, given that they share a similar setting and relationship with the site, are considered collectively in order to avoid repetition.

Woodcote House **[Plate 25]** is a large detached residence originally built by Sir Edward Northey, Attorney General to William III, Queen Anne and George I; however, the extant house now appears of largely 19th century date. The central core of the house has three storeys with flanking, single storeyed pavilions with pitched roofs. The property is rendered, with articulated bands of rustication to the ground floor level, sash windows and an Ionic porch in antis with cornice over. The Barn **[Plate 26]** is a timber framed and weather-boarded agricultural building with queen post roof trusses and a catslide roof to the north. The Tithe map and early Ordnance Survey maps shows that Woodcote House was originally set within its own undeveloped grounds and gardens, with outbuildings to the east and further outbuildings to the west (including the Barn) and with Woodcote Green separating it from the road and park land to the south.

This semi-rural and private setting has been eroded by 20th-century housing developments, namely the Woodcote Estate which now largely envelops the buildings. Woodcote House retains a small portion of private gardens which now provide its immediate setting. The Barn, however, appears rather alien amidst rows of suburban development.

Views towards the study site are at present totally restricted by intervening woodland and planting to the north of these two listed buildings. Given the lack of intervisibility, the existing level of alteration that has already occurred to the assets' setting, and the lack of any noted functional association, it is considered that the study site makes no contribution to the significance of these heritage assets, which now derive their significance from the historic and architectural values manifest within their built fabric.



Plate 25 Woodcote House



Plate 26 The Barn

5.3.4 Woodcote Green House (Grade II* Listed)

Woodcote Green House [Plate 27] is Grade II* listed and therefore considered a particularly important building, being of 'more than special interest'. The house was built in the late-17th century but has been heavily altered in the mid-18th century. It is two storeys tall plus attics, and has a series of ranges to the rear. It is built of red brick with a rendered, classical front elevation, with six-over-six sash windows, a central entrance with Doric columns, frieze, dentilled cornice, radiating fanlight and six-panelled door. Although not inspected as part of this assessment, it is noted in part of the statutory list description that the interior contains an 18th-century chimneypiece, Chinese Chippendale staircase and Rococo plaster ceilings.

Woodcote Green House is located on a corner plot overlooking the junction between Woodcote Green Road and Chalk Lane. The building is set back from the road behind red-brick garden walls and private gardens which surround the building on all sides. The boundary of the building's plot is well planted with dense, mature trees and vegetation, which limit views and provide an inward-looking and self-contained setting. The asset's wider setting has changed over time, primarily as a result of additional 20th-century residential development.

Given the orientation of the building (running parallel to Woodcote Green Road), its set back position and the level of intervening trees and built form, it is unlikely that views of the site can be obtained from within the grounds or building. At most, if any longer distance views can be obtained from the top floors or within the winter months, any views of the site would be peripheral and at such a distance as to render them insignificant amongst the surrounding built form of the wider hospital site.

Given the limited intervisibility and the lack of any noted functional association, it is considered that the study site makes no contribution to the significance of the heritage asset, which is derived from the historic and architectural values manifest within its built fabric, the immediate setting of its private grounds, and its group value with nearby properties within the Chalk Lane Conservation Area.



Plate 27 Woodcote Green House

5.3.5 Westgate House (Grade II Listed)

Westgate House [Plate 28] is dated to 1684 (date inscribed on staircase ceiling), although is much altered. The former hotel has central three-storey core which is flanked by two storeyed wings; all with steeply pitched, flat-topped mansard roofs lit by round headed dormer windows. The building is painted stucco with articulated quoins, dentilled cornice and two-over-two sash windows with plain architraves, cornices and panelled aprons.

Westgate House overlooks the junction between Woodcote Green Road and Chalk Lane and is set back from the road behind red-brick garden walls and a private car park, which extends around three sides of the building. 19th-century cartographic material shows the building with much the same setting as can be experienced today, in terms of its relationship to the road network and other surrounding historic buildings. What were once private gardens have since been tarmacked over to provide car parking, to the detriment of the building's significance. The wider setting has changed over time, primarily as a result of additional 20th-century residential development.

At present, the 1930s buildings at the front of the study site are visible from the listed building, with more extensive views of the wider site likely available from the upper floors at the northern end of the building. Given the varying types of buildings currently occupying the study site, which range in age, design and condition, the site makes a varied contribution to the setting of the asset. On balance, due to the standardised design and poor quality of the existing buildings, surrounding infrastructure and car parking, the study site is considered to make a slightly detrimental contribution to the asset's wider setting and to its significance, which is primarily derived from its immediate setting and group value with other buildings within this part of the Conservation Area, in addition to the historic and architectural interest manifest within its built fabric and social history as a former hotel.



Plate 28 Westgate House

**5.3.6 Woodcote Villa (Grade II Listed), 10
Woodcote Road (Grade II Listed), 9 & 11
Woodcote Road (Grade II Listed)**

These designated heritage assets **[Plate 29]** are all listed at Grade II and, given that they share a similar setting and relationship with the site, are considered collectively in order to avoid repetition.

Woodcote Villa and 10 Woodcote Road form a pair of semi-detached houses dating the early-19th and 18th centuries respectively. Both buildings are two storeys, the villa constructed of painted brickwork with a symmetrical front elevation with a central door and sash windows set under gauged brick arches, and with No. 10 having irregular fenestration ranging from sashes to casement windows and clad in painted weatherboarding. Nos. 9 and 11 Woodcote Road are a pair of semi-detached, two storey, early-19th-century cottages. They are built of yellow stock brick and have a hipped slate roof.

These buildings are located within the northern part of the Chalk Lane Conservation Area, and are all built to address the road network. They have a collective group value with other historic buildings within this part of the conservation area, which form their immediate setting. Located at the northern edge of the conservation area the assets' wider setting to the north and north-west consists of games courts and fields beyond which lies the hospital site, which is visible in the distance and in glimpsed views between buildings and trees. Whilst the hospital site is visible, the study site itself is not readily apparent in these views.

Given the limited intervisibility and lack of direct functional association, it is considered that the study site at present makes no contribution to the significance of the assets' setting, which is derived from their group value with other buildings within this part of the conservation area and the historic and architectural value manifest within their built fabric.



Plate 29 Woodcote Villa

5.3.7 Queen Anne House and Woodcote End House (Grade II* Listed) & Service Block to Westcote End House (Grade II Listed)

These designated heritage assets [Plate 30] are historically associated and, given that they share a similar setting and relationship with the site, are considered collectively in order to avoid repetition. Queen Anne House and Woodcote End House is Grade II* listed and therefore considered a particularly important building, being of 'more than special interest'.

Rev. Martin Madan (1726-1790) an Anglican Clergyman retired to the house seeking seclusion after a public disgrace¹⁷ during the 18th century. The principal, two-storey range dates to the mid-18th century is built of red brick with a red-tiled roof behind the parapet. It has a bowed, stucco porch with columns, round-headed windows, frieze and cornice and sash windows to the front elevation, which is largely obscured by vegetation and trees. The range to the north dates to the late-17th/early-18th century and is called Queen Anne House. This section of the building is also built of red brick and has two storeys plus attics. It is noted in the statutory list description that the interior contains an '*Elliptical entrance hall, coved ceiling and niche in wall facing door, mahogany doors. Octagonal room to South with "Adam" ceiling and walls and fireplace. Room to garden with panelled plaster ceiling. Original staircase with delicate fluted balusters and carved brackets.*'¹⁸ The single storeyed service block to the west dates to the late-18th

century; this is separately listed. It is built of red brick and as a centrally projecting bay under a pediment, with blocked central window, round headed brick niches with bands and patarae.

The buildings are set back from Woodcote Road behind stone capped, red-brick walls and private gardens containing several mature trees. Further trees and vegetation line the pavement opposite also. 19th-century cartographic material shows that the building was, at this time, surrounded by undeveloped fields to the immediate north, east and south, with the workhouse and other smaller scale development beyond. This wider setting has changed over time with use of sports pitches, car parking, the general development of the hospital site and additional residential development, to the point that, what was once experienced as a semi-rural, edge of settlement setting, is now wholly urban.

Whilst long distance views from within the grounds and ground floor rooms are likely to be heavily restricted by the intervening boundary wall and tree screening, given the orientation of the main part of the building (which is canted towards the study site), it is likely that the wider hospital site is visible in views from the upper floors. The large-scale buildings already present on the hospital site largely screen the study site at present; however the tall chimney stack belonging to the former laundry is visible.

Given the limited intervisibility between the study site and the heritage assets, as a result of intervening built form and tree screening, it is considered that, at present, the study site makes no contribution to the significance of the listed complex, which is principally derived from the group value and interrelationships between the

principal buildings and their associated service buildings, the historic association with Madan and the historic and architectural interest manifest within the built fabric. The buildings' immediate setting within private gardens and the wider Chalk Lane Conservation Area is considered to contribute to their significance.

17 Madan was heavily criticised for his book *Thelyphthora*, published in 1780, which advocated Polygamy as the only cure for female prostitution.

18 <https://historicengland.org.uk/listing/the-list/list-entry/1288644>



Plate 30 Queen Anne House and Woodcote End House

**5.3.8 2 and 4 Chalk Lane Grade II List
UID: 1028577, 6 Chalk Lane Grade II List
UID: 1378219, 8 and 10 Chalk Lane Grade
II List UID: 1028578, 12 and 14 Chalk Lane
Grade II List UID: 1378220, 5 Chalk Lane
Grade II List UID: 1028574, Stable Block to
Woodcote Grove Grade II List UID: 1028575**

These designated heritage assets **[Plate 31]** are all listed at Grade II and given that they share a similar setting and relationship with the site, are considered collectively in order to avoid repetition.

These assets form a group of two story cottages dating to the early - mid 18th century, and late 18th century stable block associated with Woodcote Grove House (located further along Chalk Lane), which line Chalk Road. Together they form a picturesque group of small scale buildings within the Conservation Area.

The buildings are set back from the narrow Chalk Lane, by small areas of pavement and some small front gardens. Given their orientation along the lane, the buildings are predominantly inward facing (i.e. addressing the lane). When viewed from Chalk Lane, the buildings are experienced in the context of the Conservation Area, surrounded by other historic buildings, gardens and mature trees and vegetation. The buildings to the west side of the road are set within small plots with rear gardens and the building to the east have an area of car parking and planting to the rear. Although their wider settings have seen much later development and alteration, this is not readily apparent from within the Conservation Area. Given the level of intervening built form and mature trees it is unlikely that the study site is visible from the assets and no return views of the assets

from within the study site were possible. Given this lack of intervisibility, and lack of any known functional association, it is considered that the study site at present, makes no contribution to the significance of the buildings.



Plate 31 Collection of listed buildings along Chalk Lane

5.3.9 Clock House (Grade II Listed), The Bell House (Grade II Listed), & East Lodge to south west of Clock House Lodge to south west of Clock House (Grade II Listed)

These designated heritage assets **[Plate 32]** are all listed at Grade II and, given that they share a similar setting and relationship with the site, are considered collectively in order to avoid repetition.

The Clock House is an early-19th-century house built by Sir James Alexander. It was built on the site of any earlier house which may have been partly incorporated in the rebuilding. The stuccoed building is three storeys tall with attics. The two, central, pedimented bays of the building project slightly and there is a central porch supported on Doric columns with a cast-iron lantern. The Bell House was once the former stables associated with the Clock House, but has since been converted into housing. The building also dates to the 19th century, with later 20th-century alterations. The two-storey building has a stuccoed front elevation, painted brick elevations elsewhere and a hipped slate roof. The three central windows on the front elevation have a pediment containing a clock face. The roof is topped with a square open bell turret supported on four columns. The 19th-century East Lodge is positioned closer to the road, which is also a stuccoed building with a slate roof and a central chimneystack. It has a pedimented gable end with a black oculus and 16-pane sash windows. There is a later single-storey, 20th-century extension to the right.

These buildings are historically associated, having formed part of one estate, and still share the same immediate setting within a shared courtyard, now given over to parking with some tree planting to the periphery. The buildings are located to the north of the busy Dorking Road, and largely surrounded by later 20th-century housing, with the wider hospital site to the south and an open green area to the east. From within the courtyard and the adjacent pavement, the tall buildings within the hospital site are visible; however, the study site itself is screened from view.

The buildings' significance is derived from the group value and interrelationships between the Clock House and its associated service buildings and the historic and architectural interest manifest within their built fabric. The buildings' immediate setting set around a courtyard is considered to contribute to their significance. Given the lack of intervisibility between the assets and the study site and the lack of any known historic functional association, it is considered that the study site makes no contribution to the significance of the heritage assets at present.



Plate 32 Bell House, Clock House and East Lodge

5.3.10 67-69 Dorking Road (Grade II Listed), The White Horse Public House (Grade II Listed), The Hylands (Grade II* Listed), Hylands House (Grade II* Listed) & West Hylands (Grade II Listed)

These designated heritage assets [Plates 33 -35] are noted in their list descriptions to form a group (along with the locally listed 75 Dorking Road). Given this, and that they share a similar setting and relationship with the site, they are considered collectively in order to avoid repetition.

The White Horse has a long history as a public house. It was originally called The New Inn and dates to the late-17th century with a 19th-century colour washed brick frontage. It is a two-storey, timber-framed building with a hipped slate roof hidden behind a parapet and has a series of side extensions. 67-69 Dorking Road are a pair of semi-detached, two-storey, 18th-century cottages. Both cottages are clad in painted weatherboarding and have casement windows, small bay windows to the ground floor and plank front doors. The cottages have a tiled roof and a central chimney stack.

The Hylands and Hyland House are both Grade II* listed and therefore considered particularly important buildings, being of 'more than special interest'. The Hylands dates to the mid-18th century. It is a two-storey building, built of red brick with a slightly recessed central section. The central doorway has rusticated pilasters, triglyph frieze, open pediment, ornamental semi-circular fanlight and a six-panelled door. Early-18th-century wrought-iron gates and railings, brick walls and stone vases are located to the front of the building and contribute to its special interest. The statutory list

description notes that the interior contains an entrance hall which extends to the depth of the house with a central staircase with turned balusters, carved brackets and a gallery supported on columns. Several 17th- and 18th-century mantelpieces and grates and bolection moulded panelling are also noted.

Hyland House dates to circa 1740. It is a three-storey building with a mansard roof, built of stock brick with red-brick dressings which is flanked by later, two-storey, canted brick bays, designed in a similar style to the main house. The building has a central Corinthian pilastered doorcase with panels of foliage between the capitals, and a frieze with shield and moulded dentelled cornice. The statutory list description notes that the interior contains *'Original staircase with open string, carved brackets and twisted balusters. West ground floor room has marble chimneypiece and glazed china cupboard, panelled walls. East front room also with marble chimneypiece.'*¹⁹ The Grade II-listed West Hylands forms part of Hylands House and is of a late-17th century date. It is a two-storey, red-brick (although partly rendered) building with a wooden, modillioned cornice at eaves height.

These buildings were all built to address the Dorking Road at the point where the first tracks to the first wells in the area diverged. The White Horse has a back of pavement position, while the other assets are set back from the road either behind grass verges, front gardens planted with mature trees, brick walls and/or railings. All of the buildings, save for the pub, have back gardens, with that of Hylands House being a larger formal garden extending southwards behind all of the others. The

earliest cartographic material found shows that in the mid-19th century these buildings were largely surrounded by undeveloped field parcels, pockets of development lining the Dorking Road and the workhouse. Over the years, the surrounding, undeveloped land has been developed for residential housing and the expansion of the workhouse and later hospital site. The tall buildings within the wider hospital site are visible within the context of these buildings when viewed from Dorking Road, and most notably in views of The White Horse and 67-69 Dorking Road. Due to intervening built form and vegetation, the study site itself is not visible in these views at present. Given the height of the buildings and close proximity, it is probable that the wider hospital site and potentially the study site is visible from views within the upper levels of some of the buildings (although internal access was not possible and therefore this could not be verified).

The buildings' significance is derived from the historic and architectural interest manifest within their built fabric and their group value. The buildings' immediate settings adjacent to Dorking Road and within their own gardens is considered to contribute to their significance. However, their wider setting, including the wider hospital site, has seen high levels of development and alteration. Given the limited intervisibility between the assets and the study site itself, and the lack of any known historic functional association, it is considered that the study site makes no contribution to the significance of the assets at present.

19 <https://historicengland.org.uk/listing/the-list/list-entry/1044740>



Plate 33 View towards the site with The White Horse and 67-69 Dorking Road in the foreground



Plate 34 The Hylands



Plate 35 Hylands House

6.0 Identification of Townscape and Visual Receptors and Assessment of Sensitivity

6.1 Introduction and Methodology

The purpose of this section is to identify and establish to sensitivity of the townscape and visual receptors that have the potential to be affected by the proposed development.

Baseline data collated from desktop study and field appraisal has enabled the identification of townscape sensitivities, particular interests, designations and viewpoints requiring special consideration. The GLVIA uses the term 'receptor' to mean both elements of the physical landscape and townscape, and people who will see the proposed development. People who will be affected by the changes in the townscape and visual environment include people living in the area, people who work there, people passing along roads, rail or other forms of transport, people visiting the area and people engaging in recreation of different types. The receptors identified are visual receptors (views), however inherent in this assessment of the receptors are the people experiencing the change in the townscape and visual environment. The assessment of townscape and visual effects has an inherent element of subjectivity and professional judgement. In order to ensure that the process is as transparent as possible a rigorous approach to assessment methodology has been adopted, taking account of published guidance.

In accordance with guidance contained in the GLVIA (2013), the sensitivity of the visual or townscape receptor is graded as low, medium or high, according to the below definitions:

Sensitivity of Visual Receptors	
Sensitivity	Description
High	<p>The view is likely to be an internationally, nationally or regionally important view. Could include landmark features of international, regional or national importance with high amenity value. The view will include significant elements of visual interest and attractive or notable compositional qualities. In addition the view will be enjoyed by a large number of recreational users and visitors, possibly there for the sole purpose of enjoying the view or the public amenity.</p> <p>The view could also include heritage assets of the highest importance.</p>
Medium	<p>Undesignated view or locally recognised view. The view could include some features of value or interest with limited signs of neglect or degradation. The view will be either intentional or incidental to the viewer, with some amenity value. The view could include significant elements of visual interest and attractive or notable compositional qualities. It may also be a view that contains heritage assets such as Grade I or II* listed buildings, scheduled monuments whose heritage significance is clearly readable, but not best represented, in this particular view.</p>
Low	<p>The view is likely to be an undesignated view, which does not include any landmark features and is low amenity value, showing signs of neglect and degradation. The view is unlikely to include elements of visual interest and attractive or notable compositional qualities. The view will be incidental to the viewer, and in most cases the viewer will be in motion. It may contain heritage assets such as Grade II listed buildings, conservation areas or locally listed buildings whose heritage significance is clearly readable, but not best represented, in this particular view.</p>

Sensitivity of townscape receptors	
Sensitivity	Description
High	The townscape is likely to contain an area designated of international, national or regional importance, with a large concentration of valued features which combine to create a sense of uniformity, richness, harmony and a distinct destination with a unique sense of place. The townscape is unique, featuring a pattern and style of development that is distinctive within an international, national or regional context and is consistent, intact and well defined.
Medium	Undesignated area or local designation, with some attractive or noteworthy features. May also include areas of regional designation, subject to townscape quality. The area will display physical elements with some uniformity and coherence of reasonable condition. The townscape is distinctive within the local context, featuring a pattern and style of development that is relatively intact, but includes a number of areas of discordant character. There may be evidence of alteration to original features, resulting in a mixed character.
Low	The townscape may have local pockets with a sense of place and local distinctiveness. However, the pattern and style of physical elements lacks uniformity and coherence, with any pockets of quality disconnected from one another. Physical elements will be of an overall poor quality.

6.2 Identification of Receptors

The study site is surrounded by the dense built form of hospital buildings to the north, which largely screen views of the townscape beyond. Beyond the hospital site to the north, lies the Dorking Road which is lined with several historic buildings and several mid-20th-century residential housing developments. Further large-scale hospital buildings and car parks are located to the east, with two-storey detached and semi-detached mid-20th-century residential properties lining the Woodcote Green Road beyond. Behind the hospital buildings, to the north-east, lies a series of sport pitches and a large sports ground and the Woodcote Conservation Area (discussed in Section 4 of this report). To the south-east lies the Chalk Lane Conservation Area (discussed in Section 4). The Woodcote Green Road and verdant Woodcote Millennium Green (privately owned but publically accessible) and woodland are located to the south of the study site, providing a leafy setting, with the private Woodcote Estate behind consisting of detached residential properties set back from the street within large garden plots. Two-storey detached and semi-detached mid-20th-century residential properties with private gardens are located the west of the study site. Beyond the suburban fringe of this part of Epsom, the town is surrounded by greenbelt which includes Epsom Common and Espom Downs Race Course. The following townscape and visual receptors have been identified:

Townscape Receptor	Description	Sensitivity
Chalk Lane Conservation Area	This is a statutorily designated area with a large concentration of valued historic buildings which combine to create a sense of uniformity and richness, with a unique sense of place. The character and appearance of the area is relatively unique when compared to the prevailing surrounding townscape, featuring a pattern of development that is intact and well defined. See 4.2.1 for further information on the significance of the area.	High
Woodcote Conservation Area	This is a statutorily designated area with a large concentration of valued historic buildings which combine to create a sense of richness and a unique sense of place. The area displays physical elements with some uniformity and coherence of reasonable condition. The area is distinctive within the local context, featuring a pattern and style of development that is relatively intact, but includes a number of areas of discordant character, including negative buildings such as the petrol station. See 4.2.2 for further information on the significance on the area.	High/Medium
Millennium Green	This Green is owned by a private trust but is used by members of the public. The Green is captured on cartographic material as early as 1838 when it is shown with an oval pond and with a collection of small houses and gardens on the north side of the road, and the Epsom Workhouse building in the distance beyond. This setting has changed considerably since with the construction of institutional buildings within the hospital site and the proliferation of residential buildings to the south. The Green and surrounding woodland has amenity value and will be valued by people who walk, sit and maintain the attractive green and wooded space. The area is distinctive within the local context and surrounding area which has seen higher levels of alteration and has a mixed character.	Medium
The Schnadhorst Memorial Ground and residential areas to the north-east lining Woodcote Road	Beyond the hospital buildings and car parks to the east is the Schnadhorst Memorial Ground; a sports and recreation ground used by Epsom Cricket Club. This is bounded to the north east by Woodcote Road which is lined with early-mid 20 th century detached and semi-detached residences set back within generally well maintained gardens. The area benefits from a leafy quality, with many mature street trees and vegetation being an integral element of its character. This is an undesignated area with some uniformity of architectural style and coherence of reasonable condition.	Medium

Dorking Road and residential areas to the north	The published Environment Character Study by EEBC notes that this is ' <i>An area of very mixed built form, a result of its proximity to the town centre, busy road thoroughfares, large institutional land uses and the railway as neighbouring areas. A succession of small scale infill and replacement development from a wide range of periods has eroded a sense of uniformity in the area - mostly from small scale cul de sac development.</i> ' ²⁰ Dorking Road is lined by several listed buildings which are attractive and noteworthy features within an area which is otherwise of mixed character.	Medium/Low
Residential area to the west of study site including Digdens Rise and Hylands Road and lining Woodcote Green Road	This is an un-designated residential area consisting of two-storey detached and semi-detached mid-20 th -century residential properties with private gardens and several mature trees. This is an undesignated area with some uniformity of architectural style and coherence in reasonable condition.	Medium/Low
Stamford Green Public Open Space	The Green forms part of the wider Stamford Green Conservation Area - a statutorily designated area with a concentration of valued historic buildings and landscaped areas which combine to create a sense of uniformity and richness, with a unique sense of place. The character and appearance of the area is relatively unique when compared to the prevailing surrounding townscape, featuring a pattern of development that is intact and well defined. The Conservation Area Appraisal notes that the ' <i>picturesque green, with its pond and listed historic inn, forms the centrepiece of the area, which is also notable for its collection of late 19th century cottages. Many of these were built to house the workers in the hospitals, which were built in the locality at this time, and they form small groups, along with more modern buildings, which infiltrate the wooded landscape of the Common. The rolling topography and the survival of other green open spaces gives the conservation area a pleasantly sylvan character.</i> '	High

20 <https://www.epsom-ewell.gov.uk/residents/planning/planning-policy/planning-and-supplementary-planning-documents/evidence-base#env%20character%20study>

The view locations are shown on **[plate 36]** and the views are shown in Section 6.

Visual Receptor	Description	Sensitivity
1	View from Woodcote Millenium Green	Low
2	View from the boundary of the Chalk Lane Conservation Area.	Low
3	View from within the Chalk Lane Conservation Area in front of the Grade II listed Westgate House and the Grade II* listed Woodcote Green House.	Medium
4	View from within the Chalk Lane Conservation Area along the narrow Chalk Lane looking towards, adjacent to the Grade II* Woodcote Green House	Medium
5	View from within Chalk Lane Conservation Area, in front of Grade II* listed Queen Anne House and Woodcote End House looking towards Grade II listed 10 Woodcote Road	Low
6	View from the boundary of Woodcote Conservation Area looking across the Schnadhorst Memorial Ground	Low
7	View from within Woodcote Conservation Area	Low
8	View from field adjacent to St Joseph's Catholic Church	Medium
9	View from Dorking Road between The Grade II listed White Horse and Grade II listed 67-69 Dorking Road.	Low
10	View from Dorking Road towards the Grade II* listed Hylands.	Medium
11	View along Woodcote Green Road with modest residential buildings lining the road	Low
12	View along Woodcote Green Road	Low
13	View from Epsom Racecourse Grandstand	Medium
14	View from Hook Road Carpark	Low
15	View across Stamford Green Public Open Space with the Grade II listed Cricketer's Pub in the background	Medium

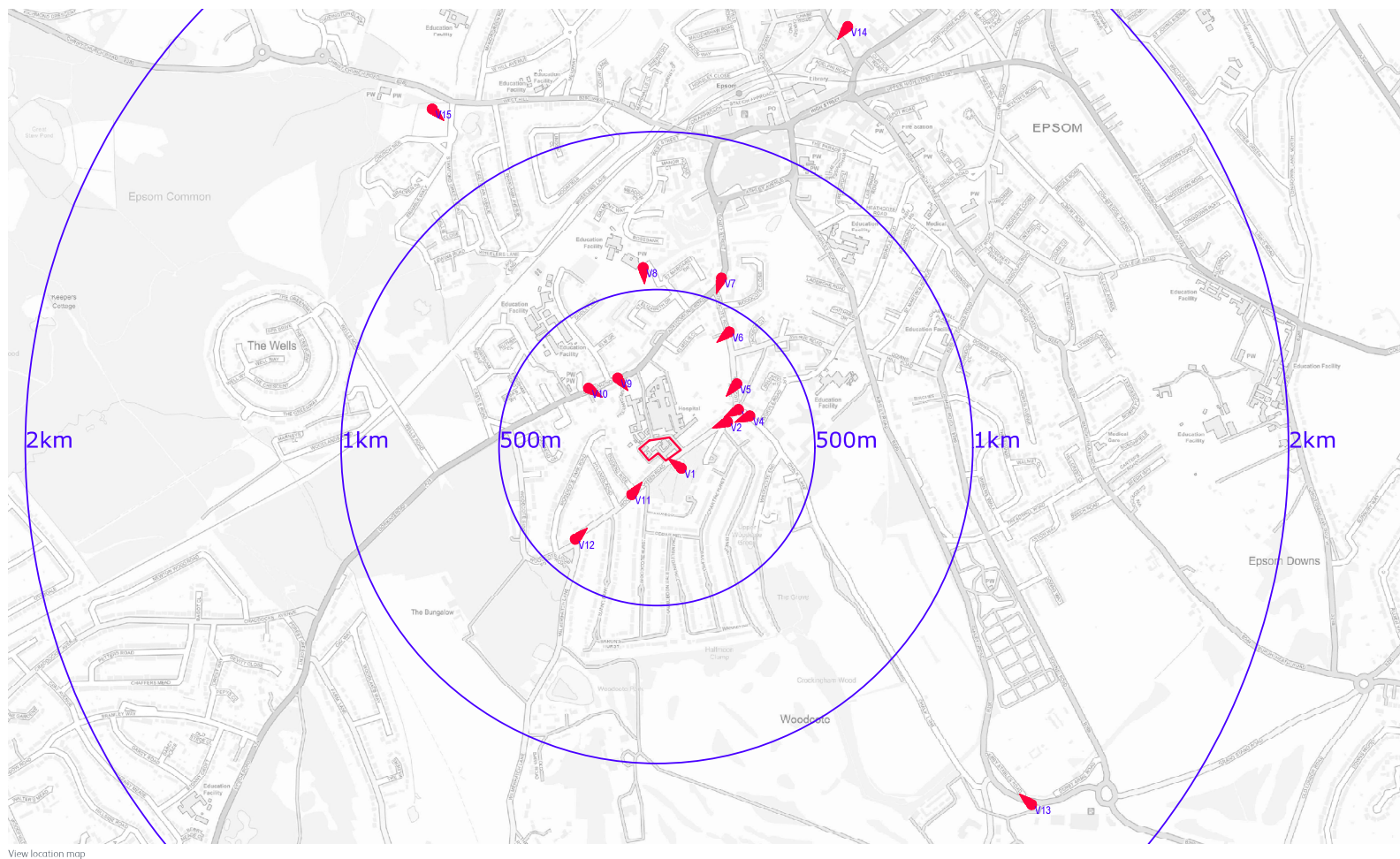


Plate 36 Plan showing suggested verified view locations

Magnitude of Change to Townscape and Visual Receptors

The following impact assessment takes into account the magnitude of change that would be caused by the proposal. Magnitude of change is an expression of the scale and type of change on townscape receptors and views that would result from the proposed development. As with sensitivity, magnitude of change is graded in bands as defined in the table below:

Magnitude of Change	
Magnitude of Changes	Description
Major	The Proposed Development constitutes an immediately apparent feature in the townscape and visual context and has a material influence on the receptor.
Moderate	The Proposed Development constitutes a visible and recognisable feature in the townscape and visual context, is generally distinguishable from the existing baseline characteristics, and has a readily apparent influence on the receptor.
Minor	The Proposed Development forms a minor component of the townscape and visual context, is generally indistinguishable from the existing baseline characteristics, and its influence on the receptor may be missed.
Negligible	The Proposed Development is barely discernible within the townscape context, is indistinguishable from the existing baseline characteristics, and its influence on the receptor equates to a 'no change' situation.
None/ Neutral	If the Proposed Development is not visible within the view and there will be no change to the view and therefore there is no effect.

7.0 Impact Assessment

7.1 Visual Impact Assessment

This section presents the 15 views shown both 'as existing' and 'as proposed'. Each 'as proposed' view is accompanied by an assessment of the change and effects on the visual receptor. The level of impact has been assessed in accordance with the below definition table:

Visual Impact	
Nature of Impact	Description
Major Adverse	The Proposed Development would cause a material deterioration in a view. In most instances this category of significance will arise where a very high or high sensitivity receptor is assessed as being likely to experience a moderate/ major magnitude of change and one which is adverse in nature. Alternatively a moderate magnitude of change on a highly sensitive receptor or a major magnitude of change on a moderate sensitivity receptor may result in a major level of significance.
Moderate Adverse	The Proposed Development would cause a notable deterioration in a view. In most instances this category of significance will arise where a moderate sensitivity receptor is assessed as being likely to experience a moderate magnitude of change and one which is adverse in nature. Alternatively a minor magnitude of change on a highly sensitive receptor or a major magnitude of change on a low sensitivity receptor may result in a moderate level of significance.
Minor Adverse	The Proposed Development would cause a perceptible deterioration in a view. In most instances this category of significance will arise where a low/moderate sensitivity receptor is assessed as being likely to experience a minor/ moderate magnitude of change and one which is adverse in nature.
Negligible	The Proposed Development would cause no discernible deterioration or improvement in a view. In most instances a negligible effect will arise where a low sensitivity receptor is assessed as being likely to experience a negligible magnitude of change.
Minor Beneficial	The Proposed Development would cause a perceptible improvement in a view. In most instances this category of significance will arise where a low/ moderate sensitivity receptor is assessed as being likely to experience a minor/ moderate magnitude of change and one which is beneficial in nature.
Moderate Beneficial	The Proposed Development would cause a notable improvement in a view. In most instances this category of significance will arise where a moderate sensitivity receptor is assessed as being likely to experience a moderate magnitude of change and one which is beneficial in nature. Alternatively a minor magnitude of change on a highly sensitive receptor or a major magnitude of change on a low sensitivity receptor may result in a moderate level of significance.
Major Beneficial	The Proposed Development would cause a material improvement in a view. In most instances this category of significance will arise where a very high or high sensitivity receptor is assessed as being likely to experience a moderate/ major magnitude of change and one which is beneficial in nature. Alternatively a moderate magnitude of change on a highly sensitive receptor or a major magnitude of change on a moderate sensitivity receptor may result in a major level of significance.

[View 1 As Existing]

View from Woodcote Millennium Green looking towards the study site. The green is captured on cartographic material as early as 1838 when it is shown with an oval pond and with a collection of small houses and gardens on the north side of the road, and the Epsom Workhouse building in the distance beyond. This view has changed considerably since with the construction of larger scale hospital buildings along Dorking Road and the proliferation of buildings within the hospital site. Whilst the park itself has amenity value and will be valued by people who walk, sit and maintain the verdant and wooded space, the view itself is undesignated, incidental and lacking scenic quality; the principal focus is of a collection buildings of limited interest and a site of poor compositional quality. People using the area will enjoy the setting of the park, however it is unlikely that they go there to enjoy this view in particular. **Sensitivity: Low**

[View 1 As proposed]

The proposals would introduce a contemporary form, modest level of additional massing and height into the rear of the view. The heights of the buildings fronting Woodcote Green Road have been kept at 4 storeys plus roof top garden and plant (the existing buildings here are 4 storeys with a pitched roof), the buildings have been set back from the roadside, the elevations have been articulated with recesses and areas of planting, and the landscape designs including additional trees have been devised in order to minimise the visual impact and mitigate harm; providing a high-quality development, which welcomes people into the landscaped central courtyard. The development constitutes a visible and recognisable feature in the visual context, is distinguishable from the existing baseline characteristics, but would not cause a discernible deterioration or improvement to the view.

Minor adverse/negligible impact on a view of low sensitivity.



View 1 As Existing



View 1 As Proposed

[View 2: As Existing]

View from the north west boundary of the Chalk Lane Conservation Area, a nationally designated heritage asset looking towards its wider setting to the west. The view includes modest residential buildings which line Woodcote Road and the four storey Rowan House which currently occupies part of the study site in the distance. The road features heavily in the view which is lined by mature trees on the left hand side. The importance of the view is in its contribution to the setting and significance of the Conservation Area. This view is not specifically identified in the Conservation Area Appraisal as contributing to its character and appearance. It is an undesignated, incidental view which would usually be experienced in motion. As detailed in section 4.2.1, the significance of the Chalk Lane Conservation Area is primarily derived from the historic and architectural group value of the historic properties within the area, the morphology of the settlement which largely relates to ribbon development along the roads and its semi-rural setting to the south and east. It is considered that the Conservation Area's significance is not best represented, in this particular view. **Sensitivity: Low**

[View 2: As proposed]

The development would introduce additional height and massing into the view. The building has been designed in an honest, modern way to suit modern day requirements and technology, however the elevations, materials palette and surrounding landscaping have been devised to help the buildings assimilate with their surroundings.

In this view the development constitutes a visible and recognisable feature in the visual context, is generally distinguishable from the existing baseline characteristics, and has an apparent influence on the receptor. The development would cause a perceptible deterioration in a view. **Minor adverse impact on a view of low sensitivity.** The impact of this on the designated asset is considered in Section 7.3.



View 2 As Existing



View 2 As Proposed

[View 3: As Existing]

View from within the Chalk Lane Conservation Area, a nationally designated heritage asset looking towards its wider setting to the west. The view includes modest residential buildings which line Woodcote Road to the right hand side and the red brick boundary wall and treed, front garden of the Grade II* listed Woodcote Green House to the left hand side. The roof of Rowan House which currently occupies part of the study site and part of a taller hospital building are visible in the distance. The importance of the view is in its contribution to the significance, character and appearance of the Conservation Area. It is an undesignated, incidental view which would usually be experienced in motion. As detailed in section 4.2.1, the significance of the Chalk Lane Conservation Area is primarily derived from the historic and architectural group value of the historic properties within the area, the morphology of the settlement which largely relates to ribbon development along the roads and its semi-rural setting to the south and east. The mature trees, vegetation and low-level pitched roofs however contribute to the semi-rural atmosphere of the area, however this view is not identified in the Conservation Area Appraisal and it is considered that the Conservation Area's significance is not best represented, in this particular view. **Sensitivity: Medium**

[View 3: As proposed]

The development would introduce additional height and massing into the view. The building has been designed in an honest, modern way to suit modern day requirements and technology, however the elevations, materials palette and surrounding landscaping have been devised to help the buildings assimilate with their surroundings. In this view the development constitutes a visible and recognisable feature in the townscape and visual context, is distinguishable from the existing baseline characteristics, and has a readily apparent influence on the view. **Moderate adverse impact on a view of medium sensitivity.** The impact of this on the designated asset is considered in Section 7.3.



View 3 As Existing



View 3 As Proposed

[View 4: As Existing]

A view towards the site from within Chalk Lane, in the Chalk Lane Conservation Area. Long distance views from within the lane are limited by the tightly packed, historic buildings which line the street. This is an incidental view looking through an opening in the dense street frontage and tree coverage, beyond the Grade II* listed Woodcote Green House, towards the site in the distance. As detailed in section 4.2.1, the significance of the Chalk Lane Conservation Area is primarily derived from the historic and architectural group value of the historic properties within the area, the morphology of the settlement which largely relates to ribbon development along the roads and its semi-rural setting to the south and east. This view is illustrative of the residential, green and semi-rural character of this part of the Conservation Area. That said, this view is not identified in the Conservation Area Appraisal and it is considered that the Conservation Area's significance is not best represented, in this particular view. **Sensitivity: Medium**

[View 4: As proposed]

The verified view shows that the proposal is entirely screened from the view by existing buildings and trees. The development would not be visible and therefore there would be **no impact** on the view.



View 4 As Existing



View 4 As Proposed

[View 5: As Existing]

A view from the Woodcote Green Road within the Chalk Lane Conservation Area, a nationally designated heritage asset looking towards its wider setting to the south west. To the left hand side of the view are two-storey cottages with pitched roofs and red brick boundary walls, typical of the Conservation Area. Occupying the central focus of the view is a timber and concrete-post fence and mature trees beyond which lie the *ad hoc* collection of brick hospital buildings. It is an undesignated, incidental view which would usually be experienced in motion. This view is not identified in the Conservation Area Appraisal and it is considered that the Conservation Area's significance is not best represented, in this particular view. **Sensitivity: Low**

[View 5: As proposed]

The verified view shows that the proposals would introduce additional height and massing into the view but that this would only be partially glimpsed through trees, vegetation and existing hospital buildings. The Proposed Development forms a minor component of the townscape and visual context, however due to high levels of screening, existing built form and distance, its influence on the receptor may be missed altogether, particularly in summer months when the trees are in leaf. The impact is partly mitigated by the design techniques embedded in the proposal including designing and positioning the buildings in relation to the existing hospital buildings and specification of materials to reflect the local context. In this sense whilst there would be a minor level of additional massing, it would cause no discernible deterioration or improvement to a view.

Minor adverse/Negligible impact on a view of low sensitivity. The impact of this on the designated asset is considered in Section 7.3.



View 5 As Existing



View 5 As Proposed

[View 6: As Existing]

A view from the edge of the Woodcote Conservation Area (a nationally designated heritage asset) looking towards its wider setting to the south west. The view looks across the Epsom cricket pitch with a netted, (presumed practice) structure, low-level, wooden fence, trees and hedges in the foreground. To the right hand side of the view is a residential house identified as making a positive contribution to the Conservation Area. Parts of the existing *ad hoc* collection of brick hospital buildings are present in the view. It is an undesignated, incidental view which would usually be experienced in motion. This view is not identified in the Conservation Area Appraisal as being of significance and it is considered that the conservation area's significance is not best represented, in this particular view. **Sensitivity: Low**

[View 6: As proposed]

The verified view shows that the proposals would be barely discernible behind intervening trees, cricket structures and existing hospital buildings. The development would cause no readily discernible deterioration or improvement in a view. **Negligible impact on a view of low sensitivity.**



View 6 As Existing



View 6 As Proposed

[View 7 As Existing]

View from within the Woodcote Conservation Area, a nationally designated heritage asset, looking south west from South Street, which runs through the centre of the area. The significance of the Conservation Area is principally derived from the collection of historic buildings which have architectural and historic interest and inward looking views. The historic brick boundary walls and mature trees within the view contribute to the character of the conservation area however the view is marred by the modern petrol station and road junction paraphernalia. As such it is considered that the Conservation Area's significance is not best represented, in this particular view. It is an undesignated, incidental view which would typically be experienced in motion.

Sensitivity: Low

[View 7 As proposed]

The verified view shows that the proposals is almost entirely screened from the view by existing buildings and trees. The development is barely discernible within the townscape context, is indistinguishable from the existing baseline characteristics, and its influence on the receptor equates to a 'no change' situation. **No impact on the importance of a view of low sensitivity.**



View 7 As Existing



View 7 As Proposed

[View 8 As Existing]

This panoramic view is gained from the playing field to the south of St Joseph's Catholic Church. Due to the location of the viewpoint in relation to the surrounding topography of Epsom, the scene illustrates the verdant setting of the town, with hints of the built form located within the dip, largely surrounded woodland and green belt land. The centre ground of the view contains the gable ends and pitched rooflines of modern residential buildings, the tall hospital buildings and laundry chimney, as well as a large scale building on the skyline are also present in the view. This is an undesignated and incidental view which nevertheless will hold amenity value to those who walk through, play or use the field and nearby buildings. The view includes some features of value or interest with limited signs of neglect or degradation. **Sensitivity: Medium**

[View 8 As proposed]

The development introduces additional massing into the view however the height of the development remains lower than the tallest part of the existing hospital buildings. The building has been designed in an honest, modern way to suit modern day requirements and technology, however the elevations, materials palette and surrounding landscaping have been devised to help the buildings assimilate with their surroundings. The additional massing will be visible beyond the existing large scale hospital buildings which are already present in the view. In this view the development constitutes a visible and recognisable feature in the townscape and visual context, and has a readily apparent influence on the view. **Moderate adverse impact on a view of medium sensitivity.**



View 8 As Existing



View 8 As Proposed

[View 9 As Existing]

The view is gained from the busy Dorking Road looking between the Grade II listed White Horse and Grade II listed 67-69 Dorking Road, which are both two storey, historic buildings. The view is largely dominated by the road and the existing large scale hospital buildings forming part of the General Hospital Site. It is an undesignated, incidental view which would typically be experienced in motion. Whilst the view contains Grade II listed buildings their significance is not best represented in this particular view. **Sensitivity: Low**

[View 9 As proposed]

The verified view shows that the proposals are heavily screened from the view by existing buildings and trees. Due to the distance and the level of screening, the development is not readily discernible within the townscape context, and sits comfortably alongside the existing baseline characteristics of the extant hospital buildings. **Negligible impact on a view of low sensitivity.**



View 9 As Existing



View 9 As Proposed

[View 10 As Existing]

View from Dorking Road towards the Grade II* listed Hylands. Hylands House is set back within a courtyard and largely screened by intervening tall, red brick boundary walls and mature trees within the view. The status of the building is apparent due to the design and quality of the brick walls and gates and the glimpses of what appears to be a tall, grand brick frontage. This is an undesignated and incidental view that would usually be experienced in motion. The view includes some features of historic and architectural interest with limited signs of neglect or degradation. **Sensitivity: Medium**

[View 10 As proposed]

The verified view shows that the proposals are heavily screened from the view by existing buildings and trees, with a very minimal section of the proposed development visible beyond intervening vegetation and built form. Due to the distance and the level of screening, the development is barely discernible forms a minor component of the townscape context and its influence on the receptor is likely to be missed. **Minor/negligible impact on a view of medium sensitivity.**



View 10 As Existing



View 10 As Proposed

[View 11 As Existing]

View looking north-east along Woodcote Green Road with residential properties, garden and paraphernalia on the left-hand side beyond which lies the four-storey red brick buildings and tall chimney currently on the site. To the right hand side is the Woodcote Millennium Green with many mature trees. It is an undesignated, incidental view which would usually be experienced in motion. The view is of low amenity value lacking elements of visual interest and attractive or notable compositional qualities.

Sensitivity: Low

[View 11 As proposed]

The proposals would introduce additional massing and height into the view. The heights of the buildings have been stepped down as they draw closer to Woodcote Green Road, with the elevations fronting the road being kept to 4 storeys plus roof top garden and plant in order to respect the existing townscape character here. The flank elevations have been articulated with recesses, windows and a combination of materials, in order to soften the impact of the additional mass. The landscape designs have been devised in order to minimise the visual impact with additional tree planting along the boundary and provide a high-quality development. The development constitutes a visible and recognisable feature in the townscape and visual context, is distinguishable from the existing baseline characteristics, though this has been mitigated in a number of ways through design. **Minor adverse impact on a view of low sensitivity.**



View 11 As Existing



View 11 As Proposed

[View 12 As Existing]

View looking north east along Woodcote Green Road close to the junction with Woodcote Side. The view is dominated by the road which is lined with mature trees, vegetation and grass verges. The site is not apparent and very little built form is visible aside from a red-brick boundary wall and glimpses of a residential property to the left-hand side. The view is an undesignated, incidental view, which does not include any landmark features and is most likely to be appreciated in motion.

Sensitivity: Low

[View 12 As proposed]

The verified view shows that the development would not be visible and therefore there would be **no impact** on the view.



View 12 As Existing



View 12 As Proposed

[View 13 As Existing]

Long distance, panoramic view from Epsom Racecourse looking north-west towards the town. Due to the location of the viewpoint in relation to the surrounding topography, the scene provides a long distance view of the town surrounded by a verdant, densely wooded setting. The foreground is dominated by the road network, buildings and paraphernalia associated with the racecourse. This is an undesignated and incidental view which nevertheless will hold amenity value to those who work at and visit the races. The view includes some features of value or interest with limited signs of neglect or degradation. **Sensitivity: Medium**

[View 13 As proposed]

The verified view shows that the proposal is entirely screened from the view by existing trees. The development would not be visible and therefore there would be **no impact** on the view.



View 13 As Existing



View 13 As Proposed

[View 14 As Existing]

View from Hook Road Carpark looking south west. This view is dominated by large, two storey buildings dating the late 20th/early 21st century, areas of hardstanding and a road network lined with some mature trees. The view is undesignated, does not include any landmark features and is of low amenity value, lacking elements of visual interest or notable compositional qualities. **Sensitivity:**

Low

[View 14 As proposed]

The verified view shows that the proposal is entirely screened from the view by existing buildings and trees. The development would not be visible and therefore there would be **no impact** on the view.



View 14 As Existing



View 14 As Proposed

[View 15 As Existing]

View from within the Stamford Green Conservation Area across Stamford Green with the Grade II listed Cricketer's Pub and several building noted as making a positive contribution (within the Conservation Area Townscape Appraisal Map) in the background. The green is adopted public open space. The view which is identified on the Conservation Area townscape appraisal has historic and visual interest with limited signs of neglect or degradation, although the number of cars within the view are considered detrimental to an appreciation of the historic and architectural significance of this piece of townscape. The view will have amenity value to those who enjoy using and walking through the green and makes a strong contribution to the significance, character and appearance of the Conservation Area.

Sensitivity: Medium

[View 15 As proposed]

The verified view shows that the proposal is entirely screened from the view by existing buildings and trees. The development would not be visible and therefore there would be **no impact** on the view.



View 15 As Existing



View 15 As Proposed

7.2 Townscape Impact Assessment

The following table has been used to assess impact on townscape:

Townscape Impacts	
Nature of Impact	Description
Major Adverse	The Proposed Development would detract from a valued landscape/townscape character receptor. It would diminish or destroy the integrity of valued, characteristic features and elements of a high quality. In most instances this category of significance will arise where a high sensitivity receptor is assessed as being likely to experience a moderate/major magnitude of change and one which is adverse in nature. Alternatively a moderate magnitude of change on a highly sensitive receptor or a major magnitude of change on a moderate sensitivity receptor may result in a major level of significance.
Moderate Adverse	The Proposed Development would cause a notable and material deterioration in the quality and value of the landscape/townscape character receptor. In most instances this category of significance will arise where a moderate sensitivity receptor is assessed as being likely to experience a moderate magnitude of change and one which is adverse in nature. Alternatively a minor magnitude of change on a highly sensitive receptor or a major magnitude of change on a low sensitivity receptor may result in a moderate level of significance.
Minor Adverse	The Proposed Development would cause a perceptible deterioration in the quality and value of the landscape/townscape character receptor. In most instances this category of significance will arise where a low/moderate sensitivity receptor is assessed as being likely to experience a minor/ moderate magnitude of change and one which is adverse in nature.
Negligible	The Proposed Development would be complementary to the receiving environment and can be accommodated comfortably while neither contributing to nor notably contrasting with the baseline characteristics of the landscape/townscape receptor. In most instances this category of significance will arise where a low sensitivity receptor is assessed as being likely to experience a negligible magnitude of change.
Minor Beneficial	The Proposed Development would cause a perceptible improvement in the quality and value of the landscape/townscape character receptor. In most instances this category of significance will arise where a low/ moderate sensitivity receptor is assessed as being likely to experience a minor/ moderate magnitude of change and one which is beneficial in nature.
Moderate Beneficial	The Proposed Development would cause a notable and material improvement in the quality and value of the landscape/townscape character receptor. In most instances this category of significance will arise where a moderate sensitivity receptor is assessed as being likely to experience a moderate magnitude of change and one which is beneficial in nature. Alternatively a minor magnitude of change on a highly sensitive receptor or a major magnitude of change on a low sensitivity receptor may result in a moderate level of significance.
Major Beneficial	The Proposed Development would cause a material improvement in the quality and value of the landscape/townscape receptor. In most instances this category of significance will arise where a very high or high sensitivity receptor is assessed as being likely to experience a moderate/ major magnitude of change and one which is beneficial in nature. Alternatively a moderate magnitude of change on a highly sensitive receptor or a major magnitude of change on a moderate sensitivity receptor may result in a major level of significance.

The following presents in tabulated form the location of the townscape receptor, the description of the change which would be caused by the proposed development and the level of impact which would result.

Townscape Receptor	Description of change	Impact
Chalk Lane Conservation Area	See 6.2.1	See 6.2.1
Woodcote Conservation Area	See 6.2.2	See 6.2.2
Millennium Green	The proposed development would have no direct, physical impact on this area but would introduce a contemporary form, additional height and massing within its setting, resulting in a minor impact. The proposals step down in height towards the residential boundaries and along Woodcote Green Road and have been set back from the roadside to allow additional planting. This alongside the use of high quality landscaping, trees and the palette of materials helps the buildings assimilate with the verdant setting of the Green and partly mitigates impact.	Minor Adverse/ Negligible
The Schnadhorst Memorial Ground and residential area to north-east	The scale and type of institutional buildings already occupying the surrounding hospital site coupled with the intervening distance and trees which line the Memorial Ground and Woodcote Road, mean that the Proposed Development would be accommodated comfortably while neither contributing to nor notably contrasting with the baseline characteristics of the townscape receptor.	Negligible
Dorking Road and residential areas to the north	The scale and type of institutional buildings already occupying the surrounding hospital site coupled with the intervening distance mean that the Proposed Development could be accommodated comfortably while neither contributing to nor notably contrasting with the baseline characteristics of the townscape receptor which is noted as mixed.	Negligible
Residential area to the west of study site and lining Woodcote Green	The proposed development would have no direct, physical impact on this area but would cause a perceptible change in the quality and townscape character receptor due to additional height and massing being introduced within the setting to the east. The way the proposals have been designed to step down in height towards the residential boundaries along with the use of high quality landscaping and palette of materials which have been designed to help the buildings assimilate with their settings helps to mitigate impact.	Minor Adverse
Stamford Green Public Open Space	No perceptible change to the townscape receptor.	No impact

7.3 Impact on Heritage Assets

The following presents in tabulated form the location of the heritage asset, the description of the change which would be caused by the proposed development and the level of impact on the significance of the heritage asset which would result.

Heritage Asset	Description of change	Impact on significance
Chalk Lane Conservation Area	The proposed development would introduce a contemporary form and additional height and massing into a small number of views from the area towards its setting to the north west. The Conservation Area's setting to the north and north west has already undergone considerable change which has lessened the contribution its makes to the asset's significance. The proposed developments would not be readily noticeable from the majority of spaces within the Conservation Area, which derives significance primarily from the historic and architectural group value of the historic properties within the area, the morphology of the settlement which largely relates to ribbon development along the roads and its semi-rural setting to the south and east.	Low level of less than substantial harm
Woodcote Conservation Area	Due to intervening distance and built form the proposed development will not be readily discernible from within the Conservation Area. This coupled with a lack of direct functional association means that there will be no impact on the significance, character or appearance of the area which derives its significance from the collection of historic buildings which have architectural and historic interest and inward looking views, rather than its wider urban setting.	No impact
Woodcote House (Grade II Listed) & Barn behind Nos 1 & 8 (Axwood) (Grade II Listed)	Given the lack of intervisibility due to intervening tree cover, the level of alteration that has already occurred to the assets' setting, and the lack of any noted functional association, it is considered that the proposed development will have no impact on the significance of these assets.	No impact

Woodcote Green House (Grade II* Listed)	<p>Given the orientation of the building (running parallel to Woodcote Green Road), its set back position and the level of intervening trees and built form, it is unlikely that views of the proposed development would be obtained from within the grounds or building. At most, if any longer distance views could be obtained from the top floors or within the winter months, any views of the site would be peripheral and at such a distance as to render them insignificant amongst the surrounding built form of the wider hospital site.</p> <p>Given this limited intervisibility and the lack of any noted functional association, it is considered that the proposed development would have no impact on the significance of the heritage asset, which is derived from the historic and architectural values manifest within its built fabric, the immediate setting of its private grounds, and its group value with nearby properties within the Chalk Lane Conservation Area.</p>	No impact
Westgate House (Grade II Listed)	<p>The proposed development would constitute a slight change to the significance of the asset as a result of additional massing and height within its wider setting, which would be experienced from views within the buildings and its immediate vicinity. Given that tall institutional buildings are already present within the area adjacent to the study site, the impact of the additional development on the building's significance is considered to be low. The development would have no impact on the asset's group value with other buildings within this part of the Conservation Area, nor the historic and architectural interest manifest within its built fabric and social history as a former hotel; all of which make a strong contribution to its significance.</p>	Low level of less than substantial harm
Woodcote Villa (Grade II Listed), 10 Woodcote Road (Grade II Listed), 9 & 11 Woodcote Road (Grade II Listed)	<p>Given the limited intervisibility and lack of direct functional association, it is considered that the proposed development would have no impact upon the significance of the assets, which is derived from their group value with other buildings within this part of the conservation area and the historic and architectural value manifest within their built fabric.</p>	No impact

Queen Anne House and Woodcote End House (Grade II* Listed) & Service Block to Westcote End House (Grade II Listed)	<p>Whilst long distance views from within the grounds and ground floor rooms are likely to be heavily restricted by the intervening boundary wall and tree screening, given the orientation of the main part of the building (which is canted towards the study site), it is likely that the wider hospital site is visible in views from the upper floors. The proposed development may therefore introduce additional height and massing which would be glimpsed behind the existing built form on the hospital site from the upper floors of the house.</p> <p>Given the limited intervisibility between the study site and the heritage assets, as a result of intervening built form and tree screening, it is considered that, the proposed development would have a negligible adverse impact on the asset's significance, which is principally derived from the group value and interrelationships between the principal buildings and their associated service buildings, the historic association with Madan and the historic and architectural interest manifest within their built fabric.</p>	Negligible Impact
2 and 4 Chalk Lane Grade II List UID: 1028577, 6 Chalk Lane Grade II List UID: 1378219, 8 and 10 Chalk Lane Grade II List UID: 1028578, 12 and 14 Chalk Lane Grade II List UID: 1378220, 5 Chalk Lane Grade II List UID: 1028574, Stable Block to Woodcote Grove Grade II List UID: 1028575	Although these assets' wider settings have seen much later development and alteration, this is not readily apparent from within the Conservation Area. Given the level of intervening built form and mature trees it is unlikely that the development would be visible from the assets and no return views of the assets from within the study site were possible. Given this lack of intervisibility, and lack of any known functional association, it is considered that the proposed development would have no impact on their significance.	No impact
Clock House (Grade II Listed), The Bell House (Grade II Listed), & East Lodge to south west of Clock House Lodge to south west of Clock House (Grade II Listed)	Any potential views from of the proposed development would be seen behind the context of existing institutional buildings on the hospital site. Given this limited intervisibility and the lack of any known historic functional association, it is considered that the proposed development would have no impact on the assets which derive their significance from their group value and interrelationships, the historic and architectural interest manifest within their built fabric and their immediate setting around a courtyard, rather than their wider urban setting.	No impact

67-69 Dorking Road (Grade II Listed), The White Horse Public House (Grade II Listed), The Hylands (Grade II* Listed), Hylands House (Grade II* Listed) & West Hylands (Grade II Listed)	The buildings' significance is derived from the historic and architectural interest manifest within their built fabric and their group value. The buildings' immediate settings adjacent to Dorking Road and within their own gardens are considered to contribute to their significance. The assets' wider setting, including the hospital site, has already seen high levels of development and alteration and is now entirely urban. †The proposed development will introduce additional height and massing into the setting of these buildings which will likely be visible within views from inside the buildings and potentially their rear gardens.	Low level of less than substantial harm
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8.0 Conclusions

The study site does not contain any designated heritage assets nor does it lie within a conservation area. All of the current buildings on the site have been approved for demolition (*planning* reference 20/01322/DEM). 57 listed buildings/ structures, the Chalk Lane Conservation Area and the Woodcote Conservation Area are located within a 500m search radius of the study site. Historic research and a site visit have been used to verify which heritage assets, out of those initially identified, could be affected by the proposals and how this would impact on their significance. Due to a lack of intervisibility and a lack of historic functional association, it has been concluded that the significance of the majority of these heritage assets would not be affected as a result of the study site's development. Of the original 57, 21 designated heritage assets and their settings have been considered in further detail in this report.

The existing buildings and areas on the study site are poor quality, comprising an ad hoc collection of heavily altered buildings and car parking areas, which lack any coherent masterplan. Buildings within the wider hospital site reach +87.74 at their highest point with additional plant and antennae; the highest point of the proposed buildings including plant would be +88.575.21 At the highest point the proposals have reduced in height from 9 to 8 storeys since the previous application; this represents a 6 m reduction more equivalent to 2 storeys. As a result of the mitigation through design that has been embedded in the evolution of the proposals, impact on many of the surrounding townscape and visual receptors would be none or negligible, with several of the views and

townscape areas as described above experiencing no readily discernible change. Other views and townscape areas, which range from low to medium sensitivity would witness minor impacts as a result of additional height and massing, and one view would experience a moderate impact

The proposals have evolved in response to the surrounding heritage and townscape context; in order to mitigate adverse impact on the surrounding context and views in the following ways:

- The tallest parts of the building have been located to the rear of the study site closest to the existing hospital buildings and stepped down significantly towards boundaries with residential areas and the Woodcote Green Road;
- The buildings have been stepped back from the Woodcote Green Road to allow for additional landscaping and tree planting;
- The buildings have been designed in an honest, contemporary style, as appropriate given its location adjacent to the wider hospital site which contains several large-scale modern buildings;
- The palette of materials has been inspired by the local area and the architects have sought to integrate high-quality landscaping, additional trees, planted window boxes and rooftop gardens in order to help to buildings assimilate with their surrounding green setting to the south and to provide an appealing and welcoming place for people to live in and visit.

Given the above it is considered that the proposal satisfies the requirement of NPPF paragraph 127c which requires that developments '*are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)*'.

The proposed development would have either no impact or a negligible impact on the significance of the majority of the surrounding heritage assets. The exception to this is the Chalk Lane Conservation Area and some of the nearby listed buildings which are likely to experience an adverse impact at the low end of the less than substantial harm spectrum. It is anticipated that the application will engage paragraphs 193, 194 and 196 of the National Planning Policy Framework which require any harm to the significance of a designated heritage asset (including from development within its setting) to have clear and convincing justification; the decision maker to weigh the identified harm against the public benefits of the scheme; and for an asset's conservation to be given great weight within that planning balance. The public benefits of the scheme have been outlined in the Planning Statement accompanying this application. The significant and considerable public benefits derived from the scheme are considered to justify the identified impact. They should be taken into account by the decision maker when considering the limited adverse impact of the proposals on the historic environment.

Appendix I – Statutory List Descriptions

BARN BEHIND NOS 1 TO 8 (AXWOOD)

Grade: II
List Entry Number: 1288643
Date first listed: 22-Mar-1974
Statutory Address: BARN BEHIND NOS 1 TO 8 (AXWOOD)

2. Probably C18. Timber framed. Weatherboarded (much renewed with planks of which the lower edge is not sawn straight). Pitched old tile roof, catslide (with gentiles) to north. Queen post roof.

Listing NGR: TQ2041859580

WOODCOTE HOUSE

Grade: II
List Entry Number: 1214288
Date first listed: 22-Mar-1974
Statutory Address: WOODCOTE HOUSE

2. Built by Sir Edward Northey. Attorney General to William III, Queen Anne and George I, but the existing house is apparently of early nineteenth century date. Three storeys, cemented, 2 - 1 - 2 sash windows, Ionic porch in antis with cornice over. Ends of elevation slightly project. Cornice and blocking course One-storey pedimented flanking pavilions.

Listing NGR: TQ2057659671

12 AND 14, CHALK LANE

Grade: II
List Entry Number: 1378220
Date first listed: 22-Mar-1974
Statutory Address: 12 AND 14, CHALK LANE

2. Early/mid C18. Colourwashed brick. Old tile roof. 2 storeys. Band. 2 ranges of windows, sashes on ground floor, modern casements above. Flush panelled doors with simple hoods.

Westgate House, Woodcote Mews, No 5 and Nos 2 to 14 (even) form a group with No 10 Woodcote Road and with Woodcote Green House and No 2 Woodcote Green Road.

Listing NGR: TQ2072259817

8 AND 10, CHALK LANE

Grade: II
List Entry Number: 1028578
Date first listed: 22-Mar-1974
Statutory Address: 8 AND 10, CHALK LANE

2. Early-mid C18. Two tall storeys, colourwashed roughcast, two old sashes. Flush Panelled doors with plain canopies approached by steps. Overhanging eaves, old tile roof with two flat topped dormers.

Westgate House, Woodcote Mews, No 5 and Nos 2 to 14 (even) form a group with No 10 Woodcote Road and with Woodcote Green House and No 2 Woodcote Green Road.

Listing NGR: TQ2071659823

6, CHALK LANE

Grade: II
List Entry Number: 1378219
Date first listed: 22-Mar-1974
Statutory Address: 6, CHALK LANE

2. Mid C18. Two storeys, colourwashed brick; three old wood mullioned windows with leaded windows. Central fielded panelled door, flat hood. Old tile roof hipped to left.

Westgate House, Woodcote Mews, No 5 and Nos 2 to 14 (even) form a group with No 10 Woodcote Road and with Woodcote Green House and No 2 Woodcote Green Road.

Listing NGR: TQ2071659831

5, CHALK LANE

Grade: II
List Entry Number: 1028574
Date first listed: 22-Mar-1974
Statutory Address: 5, CHALK LANE

2. C18. Colourwashed brick. C19 pitched slate roof, with bargeboards at gable ends. Red brick chimneys. 2 storeys. 2 ranges of flush-framed sashes with glazing bars and rubbed brick voussoirs.

Westgate House, Woodcote Mews, No 5 and Nos 2 to 14 (even) form a group with No 10 Woodcote Road and with Woodcote Green House and No 2 Woodcote Green Road

Listing NGR: TQ2072559842

SOUTH EAST BOUNDARY WALL TO WOODCOTE MEWS

Grade: II

List Entry Number: 1277058

Date first listed: 16-May-1990

Statutory Address: SOUTH EAST BOUNDARY WALL TO WOODCOTE MEWS, WORPLE ROAD

Boundary wall. C18. Comprises straight section of brick walling in Flemish bond with 2 curved sections in header bond, ramped up on the right hand side with a plinth terminating in 2 square brick gatepiers, 1 with stone finial with fluted embellishment, the other obscured by ivy at time of survey. This originally formed part of the garden walls of Westgate House, formerly known as Woodcote Place in Chalk Lane.

Listing NGR: TQ2074259854

STABLE BLOCK TO WOODCOTE GROVE

Grade: II

List Entry Number: 1028575

Date first listed: 22-Mar-1974

Statutory Address: STABLE BLOCK TO WOODCOTE GROVE, CHALK LANE

2. Late C18. Yellow stock brick. Hipped slate roof. 2 storeys. Ashlar parapet. 6 bays and frontispiece, divided by pilasters without capitals or bases. 1 range of segment-headed C19 windows in 3 right hand bays, others blind. Frontispiece breaks forward. Round arch

with moulded inposts and panelled double doors, flanked by Tuscan columns which take attic storey with 3 blind panels, moulded cornice and blocking course.

Listing NGR: TQ2071359854

2 AND 4, CHALK LANE

Grade: II

List Entry Number: 1028577

Date first listed: 22-Mar-1974

Statutory Address: 2 AND 4, CHALK LANE

EPSOM 1. 1086 CHALK LANE (West Side) Nos 2 & 4 TQ 2059 34/9 II GV 2. Mid C18. Two storeys, painted weatherboarding. Four old wood mullioned leaded casements. Similar windows to ground floor, that on right an old sash window. Six fielded panelled doors. Pedimented hoods, old tile roof.

Westgate House, Woodcote Mews, No 5 and Nos 2 to 14 (even) form a group with No 10 Woodcote Road and with Woodcote Green House and No 2 Woodcote Green Road.

Listing NGR: TQ2070759839

WOODCOTE GREEN HOUSE

Grade: II*

List Entry Number: 1214289

Date first listed: 10-Apr-1954

Statutory Address: WOODCOTE GREEN HOUSE, WOODCOTE GREEN ROAD

2. Late C17, now largely mid C18 in character. Two storeys and attic, colour- washed roughcast, five sash windows, the centre blocked, Central Doric columned doorcase with rusticated surround with frieze, dentilled cornice and six panel door with semi-circular radiating fanlight. Parapet. Three flat topped sashed dormers, mansard old tile roof, end stacks. Rear elevation irregular with hipped gabled wing to left, half hipped 2 storey and attic wing adjoining and 2 storey flanking wing to right with roof hipped on right. Old sash windows. Interior. Left hand front room with mid. C18 mantelpiece. Very good Chinese Chippendale staircase. Rococo plaster ceiling to stair well. Elliptical arch with keystone and moulded imposts on landing.

Woodcote Green House, and No 2 form a group together with No 10 Woodcote Road, and with Nos 2 to 14 (even), Westgate House, Woodcote Mews and No 5, Chalk Lane.

Listing NGR: TQ2066759851

WESTGATE HOUSE

Grade: II
List Entry Number: 1028573
Date first listed: 10-Apr-1954
Date of most recent amendment: 22-Mar-1974
Statutory Address: WESTGATE HOUSE, CHALK LANE

2. Late C17. (Dated 1684 on staircase ceiling). Three storeys and attic, painted stucco, five modern sash windows, each brought forward to frill height with plain architraves, cornices and panelled aprons. Central Doric columned portico. Dentilled eaves cornice broilght forward over windows. Steep pitched flat topped slate roof with C19 round headed dormer windows. Rear elevation of late C18 character. ? mathematical tiles. Central Venetian window 1st floor. Pedimented doorcase. Interior gutted.

Westgate House, Woodcote Mews, No 5 and Nos 2 to 14 (even) form a group with No 10 Woodcote Road and with Woodcote Green House and No 2 Woodcote Green Road

Listing NGR: TQ2070359890

10, WOODCOTE ROAD

Grade: II
List Entry Number: 1214353
Date first listed: 22-Mar-1974
Statutory Address: 10, WOODCOTE ROAD

2. C18. Painted weatherboard. Tile roof. 2 storeys. 2 casements. Early C19 shop to left hand in ground floor, with glazing bars. Mid C19 weather- boarded extension to right.

No 10 forms a group together with Woodcote Green House and No 2 Woodcote Green Road and with Nos 2 to 14 (even), Westgate House, Woodcote Mews and No 5 Chalk Lane.

Listing NGR: TQ2064659899

9 AND 11, WOODCOTE ROAD

Grade: II
List Entry Number: 1288645
Date first listed: 22-Mar-1974
Statutory Address: 9 AND 11, WOODCOTE ROAD
EPSOM 1. 1086 WOODCOTE ROAD (East Side) Nos 9 & 11 TQ 2059 34/292 II GV 2. Early C19. Yellow stock brick. Hipped slate roof. Yellow brick chimney. 2 storeys. 2 ranges of sashes with glazing bars.
Queen Anne House including garden wall, Woodcote End House and Nos 7 to 11 (odd) form a group.

Listing NGR: TQ2066159927

SERVICE BLOCK TO WOODCOTE END HOUSE

Grade: II
List Entry Number: 1214352
Date first listed: 10-Apr-1954
Date of most recent amendment: 22-Mar-1974
Statutory Address: SERVICE BLOCK TO WOODCOTE END HOUSE, 7, WOODCOTE ROAD

2. Late C18. One storey, red brick, projecting centre under pediment with blocked centre window flanked by round headed rubbed brick niches with bands and

paterae over, cornice above. Flanking parts with similar blocked round headed windows. Parapet. Hipped slate roof.

Queen Anne House including garden wall, Woodcote End House and Nos 7 to 11 (odd) form a group.

Listing NGR: TQ2066459931

GARDEN WALL TO GREEN ANNE HOUSE QUEEN ANNE HOUSE WOODCOTE END HOUSE

Grade: II*
List Entry Number: 1288644
Date first listed: 10-Apr-1954
Statutory Address: GARDEN WALL TO GREEN ANNE HOUSE, WOODCOTE ROAD
Statutory Address: QUEEN ANNE HOUSE, WOODCOTE ROAD
Statutory Address: WOODCOTE END HOUSE, WOODCOTE ROAD

2 Mid C18. Road front. Two storeys, red brick, three sash windows. Central late C18 bowed stucco porch with Tower of the Winds half columns, round headed windows and central doorway; frieze and cornice. Parapet, old tile roof. To left of this front is projecting late C17 - early C18 portion, now called Queen Anne House, of two storeys, red brick, with four casated sashes, and moulded bands to floor level and as cornice to parapet. Old panelled door to left hand with "modern Georgian" doorcase. Elevation to garden is two storeys and attic, red brick, four sashes, bands and parapet. Square hipped old tile roof with two flat topped dormers. Projecting wing on

right, two storeys, red brick, segmental bowed front and 2 - light sash on each floor. Additions to left and right. Interior. Elliptical entrance hall, coved ceiling and niche in wall facing door, mahogany doors. Octagonal room to South with "Adam" ceiling and walls and fireplace. Room to garden with panelled plaster ceiling. Original staircase with delicate fluted balusters and carved brackets. The house was the home of the Rev. Martin Madan (1726-1790) an Anglican Clergyman of Methodist views. In 1780 he published a work called "Thelyphthora" advocating Polygamy as the only cure for prostitution in women. The book raised a storm of protest and caused him to retire here in seclusion. C18 wall along west side of garden to Queen Anne House: red brick.

Queen Anne House including garden wall, Woodcote End House and Nos 7 to 11 (odd) form a group.

Listing NGR: TQ2067759971

EAST LODGE TO SOUTH WEST OF CLOCK HOUSE LODGE TO SOUTH WEST OF CLOCK HOUSE

Grade: II
List Entry Number: 1246205
Date first listed: 10-Apr-1954
Date of most recent amendment: 27-Apr-2001
Statutory Address: EAST LODGE TO SOUTH WEST OF
CLOCK HOUSE, 6, DORKING ROAD
Statutory Address: LODGE TO SOUTH WEST OF CLOCK
HOUSE, 6, DORKING ROAD

Former lodge. Early C19 with some later extensions. Stuccoed with slate roof with central stuccoed chimneystack. Pedimented gable with blank oculus and one 16-pane sash. To left is door with C20 pedimented hood and 6-panelled door. Later addition to right obscuring original window is also of one storey with hipped slate roof and 16-pane sashes. Left side set back extension with one window and one bay addition to rear obscuring an original window.

Listing NGR: TQ2039160077

THE BELL HOUSE

Grade: II
List Entry Number: 1246206
Date first listed: 10-Apr-1954
Date of most recent amendment: 27-Apr-2001
Statutory Address: THE BELL HOUSE, DORKING ROAD

Former stables, later converted into housing. Early C19 with some later C20 alterations including ground floor windows and porch. Stuccoed to front, painted brick to other elevations with hipped slate roof and stuccoed chimneystacks. Two storeys: seven windows. Pediment to central three windows with clock face. Roof has square open bell turret supported on four columns with hipped slate roof and cast iron weathervane. Paired bracket eaves cornice. Windows are 12-pane sashes throughout, ground floor windows replacing garage doors. C20 porch and double doors.

Listing NGR: TQ2036260084

CLOCK HOUSE

Grade: II
List Entry Number: 1044742
Date first listed: 10-Apr-1954
Date of most recent amendment: 27-Apr-2001
Statutory Address: CLOCK HOUSE, DORKING ROAD
House. Early C19, built by Sir James Alexander, but on the site of an earlier house and possibly with earlier core. Stuccoed with slate roof and two tall stuccoed chimneystacks. Three storeys and attics in central pediment: 6 windows. Paired bracket eaves cornice. Central two bays project slightly. Attic has 12-pane sash with horns. Second floor has 9-pane sashes. First floor has 12-pane sashes with moulded architraves and patterned blind boxes. Ground floor has tall 12-pane sashes. Central Doric tetrastyle porch with cast iron lantern and C20 double doors. Left side has giant arch with C20 window at the top and late C18 doorcase with swag frieze with cherubs above half columns.

[Illustrated as 'The Elms, Epsom in Stanley C Ramsay's "Smaller houses of the Late Georgian Period".]

Listing NGR: TQ2039560125

THE WHITE HORSE PUBLIC HOUSE

Grade: II
List Entry Number: 1232220

Date first listed: 24-Jun-1976

Statutory Address: THE WHITE HORSE PUBLIC HOUSE,
DORKING ROAD

II GV 2. Late C17, with possible C18 alterations and a mid C19 front. Timber-framed. Front colour-washed brick. Hipped slate roof. Two storeys. Parapet. Three ranges of sashes, with glazing bars to West. 2 ranges of sashes without glazing bars to North. Two storey extension, with 1 range of sashes with glazing bars to South.

The White Horse was originally the New Inn, not Waterloo House, as has been supposed. This is made clear by a rental (of 1755 which refers to New Inn lane, the present South Street) as the road leading to New Inn. It is first mentioned in a court document of 1672, and is one of the group of buildings which grew up around the point where the track to the first wells diverged from the Dorking Road.

The White Horse Public House forms a group with Nos 67, 69, The Hylands including forecourt walls, piers, clairvoyee and gates, No 71, Hylands House including forecourt railings and No 75 (No 75 is a local interest building).

Listing NGR: TQ2030959968

67 AND 69, DORKING ROAD

Grade: II

List Entry Number: 1378248

Date first listed: 22-Mar-1974

Statutory Address: 67 AND 69, DORKING ROAD

2. C18, Two storeys, painted weatherboarding, two casements. Two small bay windows ground floor and two plank doors. Old tile roof, central stack.

Nos 67, 69, The Hylands including forecourt walls, piers, clairvoyee and gates, No 71, Hylands house including forecourt railings and No 75 form a group.

Listing NGR: TQ2027959958

THE HYLANDS, INCLUDING FORECOURT WALLS, PIERS, CLAIRVOYEE AND GATES

Grade: II*

List Entry Number: 1044739

Date first listed: 10-Apr-1954

Statutory Address: THE HYLANDS, INCLUDING FORECOURT WALLS, PIERS, CLAIRVOYEE AND GATES, DORKING ROAD

2. Mid C18 front. Two storeys, red brick, 2 - 3 - 2 sashes, the centre part recessed slightly. Central doorway with rusticated pilasters, triglyph frieze, open pediment, ornamental semi-circular fanlight, six panel door. Brick pilaster to left of door to full height. Band and parapet. Early C18 wrought iron gates and railings; brick walls and piers with stone vases. Rear has early C19 porch on fluted iron columns with foliate capitals. Interior. Paved entrance hall the depth of house with central staircase in two flights, turned balusters, carved brackets, gallery supported on columns. Several late C17 and C18

mantelpieces and grates. Dressing room with bolection moulded panelling. Various fittings to kitchen. Back stairs with solid string and twisted balusters.

Nos 67, 69, The Hylands including forecourt walls, piers, clairvoyee and gates, No 71, Hylands house including forecourt railings and No 75 form a group.

Listing NGR: TQ2025259943

WEST HYLANDS

Grade: II

List Entry Number: 1378249

Date first listed: 10-Apr-1954

Statutory Address: WEST HYLANDS, 71, DORKING ROAD

2. Really part of The Hylands. Probably late C17, two storeys, red brick, old rushes, wood modillioned eaves cornice. Portion to right is two storeys, roughcast, sash windows, old tiles throughout.

Nos 67, 69, The Hylands including forecourt walls, piers, clairvoyee and gates, No 71, Hylands house including forecourt railings and No 75 form a group.

Listing NGR: TQ2023259902

FORECOURT RAILS TO HYLANDS HOUSE HYLANDS HOUSE

Grade: II*

List Entry Number: 1044740

Date first listed: 10-Apr-1954

Statutory Address: FORECOURT RAILS TO HYLANDS
HOUSE, DORKING ROAD

Statutory Address: HYLANDS HOUSE, DORKING ROAD

2. Circa 1740. Three storeys, stock brick with red brick dressings. Five tall narrow sash windows, with outer ones to each side of half width. Two later 2 storey canted brick bays with cornice and blocking course in similar style to house replacing two windows each, each side of the centre. Central Corinthian fluted pilastered doorcase having ornamental panel of foliage between the capitals, frieze with shield and moulded dentilled cornice. Central 1st floor window with round head, plain band surround of rubbed brick with stone key and archivolt, stone cill and brackets; similar flat arched window 2nd floor. Bands between storeys, angle quoins, cornice, panelled parapet. Flat topped mansard elate roofed attic to top floor with three sash windows, Interior. Original staircase with open string, carved brackets and twisted balusters. West ground floor room has marble chimneypiece and glazed china cupboard, panelled walls. East front room also with marble chimneypiece. C18 rails in poor condition to forecourt.

Nos 67, 69, The Hylands including forecourt walls, piers, clairvoyee and gates, No 71, Hylands house including forecourt railings and No 75 form a group.

Listing NGR: TQ2022659907

Appendix II - Planning Policy and Guidance

Planning (Listed Buildings and Conservation Areas) Act 1990

The Act is legislative basis for decision making on applications that relate to the historic environment.

Sections 16, 66 and 72 of the Act impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that:

in considering whether to grant 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.

Similarly, section 72(l) of the above Act states that:

... with respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

National Planning Policy Framework

Any proposals for consent relating to heritage assets are subject to the policies of the NPPF (February 2019). This sets out the Government's planning policies for England and how these are expected to be applied. With regard to 'Conserving and enhancing the historic environment', the

framework requires proposals relating to heritage assets to be justified and an explanation of their effect on the heritage asset's significance provided.

Paragraph 7 of the Framework states that the purpose of the planning system is to 'contribute to the achievement of sustainable development' and that, at a very high level, 'the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

At paragraph 8, the document expands on this as follows:

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives:

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment,

with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

and notes at paragraph 10:

10. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11).

With regard to the significance of a heritage asset, the framework contains the following policies:

190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal.

In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 192 of the NPPF identifies the following criteria in relation to this:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- c) the desirability of new development making a positive contribution to local character and distinctiveness.*

With regard to potential 'harm' to the significance designated heritage asset, in paragraph 193 the framework states the following:

...great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether the any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

The Framework goes on to state at paragraph 194 that:

Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.

Where a proposed development will lead to 'substantial harm' to or total loss of significance of a designated heritage asset paragraph 195 of the NPPF states that:

...local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

With regard to 'less than substantial harm' to the significance of a designated heritage asset, of the NPPF states the following;

196. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

In terms of non-designated heritage assets, the NPPF states:

197. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balance judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

The Framework requires local planning authorities to look for opportunities for new development within conservation areas and world heritage sites and within the setting of heritage assets to enhance or better reveal their significance. Paragraph 200 states that:

Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Concerning conservation areas and world heritage sites it states, in paragraph 201, that:

Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

The National Planning Practice Guidance (NPPG) was published on the 23rd July 2019 to support the National Planning Policy Framework (NPPF) 2019 and the planning system. It includes particular guidance on matters relating to protecting the historic environment in the section: Conserving and Enhancing the Historic Environment.

The relevant guidance is as follows:

Paragraph 2: What is meant by the conservation and enhancement of the historic environment?

Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use and as yet undiscovered, undesignated buried remains of archaeological interest.

In the case of buildings, generally the risks of neglect and decay of heritage assets are best addressed through ensuring that they remain in active use that is consistent with their conservation. Ensuring such heritage assets remain used and valued is likely to require sympathetic changes to be made from time to time. In the case of archaeological sites, many have no active use, and so for those kinds of sites, periodic changes may not be necessary, though on-going management remains important.

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning permission and listed building consent to ensure that heritage assets are conserved,

and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.

Part of the public value of heritage assets is the contribution that they can make to understanding and interpreting our past. So where the complete or partial loss of a heritage asset is justified (noting that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted), the aim then is to:

- capture and record the evidence of the asset's significance which is to be lost
- interpret its contribution to the understanding of our past; and
- make that publicly available (National Planning Policy Framework paragraph 199)

Paragraph 6: What is "significance"?

'Significance' in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting.

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

- archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.
- historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

In legislation and designation criteria, the terms 'special architectural or historic interest' of a listed building and the 'national importance' of a scheduled monument are used to describe all or part of what, in planning terms, is referred to as the identified heritage asset's significance.

Paragraph 7: Why is 'significance' important in decision-taking?

Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of

the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

Paragraph 13: What is the setting of a heritage asset and how should it be taken into account?

The setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

Paragraph 15: What is the optimum viable use for a heritage asset and how is it taken into account in planning decisions?

The vast majority of heritage assets are in private hands. Thus, sustaining heritage assets in the long term often requires an incentive for their active conservation. Putting heritage assets to a viable use is likely to lead to the investment in their maintenance necessary for their long-term conservation.

By their nature, some heritage assets have limited or even no economic end use. A scheduled monument in a rural area may preclude any use of the land other than as a pasture, whereas a listed building may potentially have a variety of alternative uses such as residential, commercial and leisure.

In a small number of cases a heritage asset may be capable of active use in theory but be so important and sensitive to change that alterations to accommodate a viable use would lead to an unacceptable loss of significance.

It is important that any use is viable, not just for the owner, but also for the future conservation of the asset: a series of failed ventures could result in a number of unnecessary harmful changes being made to the asset.

If there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one. Nor need it be the original use. However, if from a conservation point of view there is no real difference between alternative economically viable uses, then the choice of use is a decision for the owner, subject of course to obtaining any necessary consents.

Harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised. The policy on addressing substantial and less than substantial harm is set out in paragraphs 193-196 of the National Planning Policy Framework.

Paragraph 18: How can the possibility of harm to a heritage asset be assessed?

What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy

Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194-196) apply.

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

Whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less

than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting.

The National Planning Policy Framework confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). It also makes clear that any harm to a designated heritage asset requires clear and convincing justification and sets out certain assets in respect of which harm should be exceptional/wholly exceptional (see National Planning Policy Framework, paragraph 194).

Paragraph 20: What is meant by the term public benefits?

The National Planning Policy Framework requires any harm to designated heritage assets to be weighed against the public benefits of the proposal.

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible

to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
- reducing or removing risks to a heritage asset
- securing the optimum viable use of a heritage asset in support of its long term conservation

Paragraph 39: What are non-designated heritage assets and how important are they?

Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.

A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.

Paragraph 40: How are non-designated heritage assets identified?

There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and

conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.

Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developers and decision-makers. This includes information on the criteria used to select non-designated heritage assets and information about the location of existing assets.

It is important that all non-designated heritage assets are clearly identified as such. In this context, it can be helpful if local planning authorities keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies. (Advice on local lists can be found on Historic England's website.) They should also ensure that up to date information about non-designated heritage assets is included in the local historic environment record. In some cases, local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications, for example, following archaeological investigations. It is helpful if plans note areas with potential for the discovery of non-designated heritage assets with archaeological interest. The historic environment record will be a useful indicator of archaeological potential in the area.

Historic England: Historic Environment Good Practice Advice in Planning (March 2015)

The purpose of the Good Practice Advice note is to provide information on good practice to assist in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the National Planning Practice Guide (NPPG).

Note 2 'Managing Significance in Decision-Taking'

This note provides information on:

- assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

It states that:

The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or investigate the asset needs to be proportionate to the significance of the heritage assets affected and the impact on that significance.

In their general advice on decision-taking, this note advises that:

Development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect. The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest.

Paragraph 6 highlights the NPPF and NPPG's promotion of early engagement and pre-application discussion, and the early consideration of significance of the heritage asset in order to ensure that any issues can be properly identified and addressed. Furthermore, the note advises that:

As part of this process, these discussions and subsequent applications usually benefit from a structured approach to the assembly and analysis of relevant information. The stages below indicate the order in which this process can be approached – it is good practice to check individual stages of this list but they may not be appropriate in all cases and the level of detail applied should be proportionate.

- Understand the significance of the affected assets;
- Understand the impact of the proposal on that significance;
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
- Look for opportunities to better reveal or enhance significance;

- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The Assessment of Significance as part of the Application Process

Paragraph 7 emphasises the need to properly assess the nature, extent and importance of the significance of a heritage asset and the contribution of its setting early in the process, in order to form a successful development, and in order for the local planning authority to make decisions in line with legal objectives and the objectives of the development plan and the policy requirements of the NPPF.

8. Understanding the nature of the significance is important to understanding the need for and best means of conservation. For example, a modern building of high architectural interest will have quite different sensitivities from an archaeological site where the interest arises from the possibility of gaining new understanding of the past.
9. Understanding the extent of that significance is also important because this can, among other things, lead to a better understanding of how adaptable the asset may be and therefore improve viability and the prospects for long term conservation.

10. Understanding the level of significance is important as it provides the essential guide to how the policies should be applied. This is intrinsic to decision-taking where there is unavoidable conflict with other planning objectives.
11. To accord with the NPPF, an applicant will need to undertake an assessment of significance to inform the application process to an extent necessary to understand the potential impact (positive or negative) of the proposal and to a level of thoroughness proportionate to the relative importance of the asset whose fabric or setting is affected.

Curtilage Structures

15. Some buildings and structures are deemed designated as listed buildings by being fixed to the principal building or by being ancillary within its curtilage and pre-dating 1 July 1948. Whether alteration, extension or demolition of such buildings amounts to harm or substantial harm to the designated heritage asset (i.e. the listed building together with its curtilage and attached buildings) needs careful consideration. Some curtilage structures are of high significance, which should be taken fully into account in decisions, but some are of little or none. Thus, like other forms of heritage asset, curtilage structures should be considered in proportion to their significance. Listed buildings designated very recently (after 25 June 2013)

are likely to define curtilage definitively; where this is (or is not) the case will be noted in the list description.

Cumulative Impact

28. The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building's plan form or an original designed landscape.

Listed Building Consent Regime

29. Change to heritage assets is inevitable but it is only harmful when significance is damaged. The nature and importance of the significance that is affected will dictate the proportionate response to assessing that change, its justification, mitigation and any recording which may be needed if it is to go ahead. In the case of listed buildings, the need for owners to receive listed building consent in advance of works which affect special interest is a simple

mechanism but it is not always clear which kinds of works would require consent. In certain circumstances there are alternative means of granting listed building consent under the Enterprise & Regulatory Reform Act 2013.

Opportunities to Enhance Assets, their Settings and Local Distinctiveness

52. Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation.

Design and Local Distinctiveness

53. Both the NPPF (section 7) and PPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- The history of the place
- The relationship of the proposal to its specific site
- The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept
- The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size
- The size and density of the proposal related to that of the existing and neighbouring uses
- Landmarks and other built or landscape features which are key to a sense of place
- The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces
- The topography
- Views into, through and from the site and its surroundings
- Landscape design
- The current and historic uses in the area and the urban grain
- The quality of the materials

Note 3 'The Setting of Heritage Assets' (December 2017)

This note provides guidance on the setting of heritage assets, which is separate to issues of curtilage, character or context.

The Extent of Setting

8. The NPPF makes it clear that the extent of the setting of a heritage asset 'is not fixed and may change as the asset and its surroundings evolve'. All of the following matters may affect considerations of the extent of setting:
- While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time, and because new information on heritage assets may alter what might previously have been understood to comprise their setting and the values placed on that setting and therefore the significance of the heritage asset.
 - Extensive heritage assets, such as historic parks and gardens, landscapes and townscapes, can include many heritage assets, historic associations between them and their nested and overlapping settings, as well as having a setting of their own. A conservation area is likely to include the settings of listed buildings and have its own setting, as will the hamlet, village or urban area in which it is situated (explicitly recognised in green belt designations).
 - Consideration of setting in urban areas, given the potential numbers and proximity of heritage assets, often overlaps with considerations both of townscape/urban design and of the character and appearance of conservation areas. Conflict between impacts on setting and other aspects of

a proposal can be avoided or mitigated by working collaboratively and openly with interested parties at an early stage.

Views and Setting

10. The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.

11. Views which contribute more to understanding the significance of a heritage asset include:

- those where the composition within the view was a fundamental aspect of the design or function of the heritage asset
- those where town- or village-scape reveals views with unplanned or unintended beauty
- those with historical associations, including viewing points and the topography of battlefields
- those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected
- those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant

12. Assets, whether contemporaneous or otherwise, which were intended to be seen from one another for aesthetic, functional, ceremonial or religious reasons include:

- military and defensive sites
- telegraphs or beacons
- prehistoric funerary and ceremonial sites
- historic parks and gardens with deliberate links to other designed landscapes and remote 'eye-catching' features or 'borrowed' landmarks beyond the park boundary

13. Views may be identified and protected by local planning policies and guidance for the part they play in shaping our appreciation and understanding of England's historic environment, whether in rural or urban areas and whether designed to be seen as a unity or as the cumulative result of a long process of development. This does not mean that additional views or other elements or attributes of setting do not merit consideration. Such views include:

- views identified as part of the plan-making process, such as those identified in the London View Management Framework (LVMF, Mayor of London 2010) and Oxford City Council's View Cones (2005) and Assessment of the Oxford View Cones (2015 Report)
- views identified in character area appraisals or in management plans, for example of World Heritage Sites

- important designed views from, to and within historic parks and gardens that have been identified as part of the evidence base for development plans, and
- views that are identified by local planning authorities when assessing development proposals

Where complex issues involving views come into play in the assessment of such views – whether for the purposes of providing a baseline for plan-making or for development management – a formal views analysis may be merited.

Setting and the Significance of Heritage Assets

9. Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance. The following paragraphs examine some more general considerations relating to setting and significance.

Cumulative Change

Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape

or the removal of structures impairing key views of it (see also paragraph 40 for screening of intrusive developments).

Change over Time

Settings of heritage assets change over time. Understanding this history of change will help to determine how further development within the asset's setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance but settings which have changed may also themselves enhance significance, for instance where townscape character has been shaped by cycles of change over the long term. Settings may also have suffered negative impact from inappropriate past developments and may be enhanced by the removal of the inappropriate structure(s).

Access and Setting

Because the contribution of setting to significance does not depend on public rights or ability to access it, significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting, constraints on access such as remoteness or challenging terrain, and the importance of the setting to a local community who may be few in number. The potential for appreciation of the asset's significance

may increase once it is interpreted or mediated in some way, or if access to currently inaccessible land becomes possible.

Buried Assets and Setting

Heritage assets that comprise only buried remains may not be readily appreciated by a casual observer. They nonetheless retain a presence in the landscape and, like other heritage assets, may have a setting. These points apply equally, in some rare cases, to designated heritage assets such as scheduled monuments or Protected Wreck Sites that are periodically, partly or wholly submerged, eg in the intertidal zone on the foreshore.

The location and setting of historic battles, otherwise with no visible traces, may include important strategic views, routes by which opposing forces approached each other and a topography and landscape features that played a part in the outcome.

Buried archaeological remains may also be appreciated in historic street or boundary patterns, in relation to their surrounding topography or other heritage assets or through the long- term continuity in the use of the land that surrounds them. While the form of survival of an asset may influence the degree to which its setting contributes to significance and the weight placed on it, it does not necessarily follow that the contribution is nullified if the asset is obscured or not readily visible.

Designed Settings

Many heritage assets have settings that have been designed to enhance their presence and visual interest or to create experiences of drama or surprise. In these special circumstances, these designed settings may be regarded as heritage assets in their own right, for instance the designed landscape around a country house. Furthermore they may, themselves, have a wider setting: a park may form the immediate surroundings of a great house, while having its own setting that includes lines-of-sight to more distant heritage assets or natural features beyond the park boundary. Given that the designated area is often restricted to the 'core' elements, such as a formal park, it is important that the extended and remote elements of the design are included in the evaluation of the setting of a designed landscape. Reference is sometimes made to the 'immediate', 'wider' and 'extended' setting of heritage assets, but the terms should not be regarded as having any particular formal meaning. While many day-to-day cases will be concerned with development in the vicinity of an asset, development further afield may also affect significance, particularly where it is large- scale, prominent or intrusive. The setting of a historic park or garden, for instance, may include land beyond its boundary which adds to its significance but which need not be confined to land visible from the site, nor necessarily the same as the site's visual boundary. It can include:

- land which is not part of the park or garden but which is associated with it by being adjacent and visible from it
- land which is not part of the site but which is adjacent and associated with it because it makes an

important contribution to the historic character of the site in some other way than by being visible from it, and

- land which is a detached part of the site and makes an important contribution to its historic character either by being visible from it or in some other way, perhaps by historical association

Setting and Urban Design

As mentioned above (paragraph 8, The extent of setting), the numbers and proximity of heritage assets in urban areas mean that the protection and enhancement of setting is intimately linked to townscape and urban design considerations. These include the degree of conscious design or fortuitous beauty and the consequent visual harmony or congruity of development, and often relates to townscape attributes such as enclosure, definition of streets and spaces and spatial qualities as well as lighting, trees, and verges, or the treatments of boundaries or street surfaces.

Setting and Economic and Social Viability

Sustainable development under the NPPF can have important positive impacts on heritage assets and their settings, for example by bringing an abandoned building back into use or giving a heritage asset further life. However, the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development. For instance, a new road scheme affecting the setting of a heritage asset, while in some cases increasing the public's ability or inclination to visit and/or use it, thereby boosting its economic viability and

enhancing the options for the marketing or adaptive re-use of a building, may in other cases have the opposite effect.

Landscape Assessment and Amenity

14. Analysis of setting is different from landscape assessment. While landscapes include everything within them, the entirety of very extensive settings may not contribute equally to the significance of a heritage asset, if at all. Careful analysis is therefore required to assess whether one heritage asset at a considerable distance from another, though intervisible with it – a church spire, for instance – is a major component of the setting, rather than just an incidental element within the wider landscape.
15. Assessment and management of both setting and views are related to consideration of the wider landscape, which is outside the scope of this advice note. Additional advice on views is available in Guidelines for Landscape and Visual Impact Assessment, 3rd edition, published by the Landscape Institute and the Institute of Environmental Management and Assessment (in partnership with Historic England).
16. Similarly, setting is different from general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting.

A Staged Approach to Proportionate Decision-taking

17. All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it. This capacity may vary between designated assets of the same grade or of the same type or according to the nature of the change. It can also depend on the location of the asset: an elevated or overlooked location; a riverbank, coastal or island location; or a location within an extensive tract of flat land may increase the sensitivity of the setting (ie the capacity of the setting to accommodate change without harm to the heritage asset's significance) or of views of the asset. This requires the implications of development affecting the setting of heritage assets to be considered on a case-by-case basis.
18. Conserving or enhancing heritage assets by taking their settings into account need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development. Many places coincide with the setting of a heritage asset and are subject to some degree of change over time. NPPF policies, together with the guidance on their implementation in the Planning Policy Guidance (PPG), provide

the framework for the consideration of change affecting the setting of undesignated and designated heritage assets as part of the decision-taking process (NPPF, paragraphs 131-135 and 137).

19. Amongst the Government's planning policies for the historic environment is that conservation decisions are based on a proportionate assessment of the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset. Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to the complexity of the case, from straightforward to complex:

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: Make and document the decision and monitor outcomes

Historic England: Conservation Principles and Assessment (2008)

Conservation Principles (2008) explores, on a more philosophical level, the reason why society places a value on heritage assets beyond their mere utility. It identifies four types of heritage value that an asset may hold: aesthetic, communal, historic and evidential value. This is simply another way of analysing its significance. These values can help shape the most efficient and effective way of managing the heritage asset so as to sustain its overall value to society.

Evidential Value

35. Evidential value derives from the potential of a place to yield evidence about past human activity.
36. Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them. These remains are part of a record of the past that begins with traces of early humans and continues to be created and destroyed. Their evidential value is proportionate to their potential to contribute to people's understanding of the past.
37. In the absence of written records, the material record, particularly archaeological deposits, provides the only source of evidence about the distant past. Age is therefore a strong indicator of relative evidential value, but is not paramount,

since the material record is the primary source of evidence about poorly documented aspects of any period. Geology, landforms, species and habitats similarly have value as sources of information about the evolution of the planet and life upon it.

38. Evidential value derives from the physical remains or genetic lines that have been inherited from the past. The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.

Historical Value

39. Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative.
40. The idea of illustrating aspects of history or prehistory – the perception of a place as a link between past and present people – is different from purely evidential value. Illustration depends on visibility in a way that evidential value (for example, of buried remains) does not. Places with illustrative value will normally also have evidential value, but it may be of a different order of importance. An historic building that is one of many similar examples may provide little unique evidence about the past, although each illustrates the intentions of its creators equally well. However, their distribution, like that of planned landscapes, may be of considerable

	evidential value, as well as demonstrating, for instance, the distinctiveness of regions and aspects of their social organisation.		
41.	Illustrative value has the power to aid interpretation of the past through making connections with, and providing insights into, past communities and their activities through shared experience of a place. The illustrative value of places tends to be greater if they incorporate the first, or only surviving, example of an innovation of consequence, whether related to design, technology or social organisation. The concept is similarly applicable to the natural heritage values of a place, for example geological strata visible in an exposure, the survival of veteran trees, or the observable interdependence of species in a particular habitat. Illustrative value is often described in relation to the subject illustrated, for example, a structural system or a machine might be said to have 'technological value'.	43.	Many buildings and landscapes are associated with the development of other aspects of cultural heritage, such as literature, art, music or film. Recognition of such associative values tends in turn to inform people's responses to these places. Associative value also attaches to places closely connected with the work of people who have made important discoveries or advances in thought about the natural world.
42.	Association with a notable family, person, event, or movement gives historical value a particular resonance. Being at the place where something momentous happened can increase and intensify understanding through linking historical accounts of events with the place where they happened – provided, of course, that the place still retains some semblance of its appearance at the time. The way in which an individual built or furnished their house, or made a garden, often provides insight into their personality, or demonstrates their political or	44.	The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value.
		45.	The use and appropriate management of a place for its original purpose, for example as a place of recreation or worship, or, like a watermill, as a machine, illustrates the relationship between design and function, and so may make a major contribution to its historical values. If so,
			cessation of that activity will diminish those values and, in the case of some specialised landscapes and buildings, may essentially destroy them. Conversely, abandonment, as of, for example, a medieval village site, may illustrate important historical events.
			Aesthetic Value
		46.	Aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place.
		47.	Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects – for example, where the qualities of an already attractive landscape have been reinforced by artifice – while others may inspire awe or fear. Aesthetic values tend to be specific to a time and cultural context, but appreciation of them is not culturally exclusive.
		48.	Design value relates primarily to the aesthetic qualities generated by the conscious design of a building, structure or landscape as a whole. It embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship. It may extend to an intellectual programme governing the design (for example, a building

- as an expression of the Holy Trinity), and the choice or influence of sources from which it was derived. It may be attributed to a known patron, architect, designer, gardener or craftsman (and so have associational value), or be a mature product of a vernacular tradition of building or land management. Strong indicators of importance are quality of design and execution, and innovation, particularly if influential.
49. Sustaining design value tends to depend on appropriate stewardship to maintain the integrity of a designed concept, be it landscape, architecture, or structure.
50. It can be useful to draw a distinction between design created through detailed instructions (such as architectural drawings) and the direct creation of a work of art by a designer who is also in significant part the craftsman. The value of the artwork is proportionate to the extent that it remains the actual product of the artist's hand. While the difference between design and 'artistic' value can be clear-cut, for example statues on pedestals (artistic value) in a formal garden (design value), it is often far less so, as with repetitive ornament on a medieval building.
51. Some aesthetic values are not substantially the product of formal design, but develop more or less fortuitously over time, as the result of a succession of responses within a particular cultural framework. They include, for example, the seemingly organic form of an urban or rural landscape; the relationship of vernacular buildings and structures and their materials to their setting; or a harmonious, expressive or dramatic quality in the juxtaposition of vernacular or industrial buildings and spaces. Design in accordance with Picturesque theory is best considered a design value.
52. Aesthetic value resulting from the action of nature on human works, particularly the enhancement of the appearance of a place by the passage of time ('the patina of age'), may overlie the values of a conscious design. It may simply add to the range and depth of values, the significance, of the whole; but on occasion may be in conflict with some of them, for example, when physical damage is caused by vegetation charmingly rooting in masonry. 53 While aesthetic values may be related to the age of a place, they may also (apart from artistic value) be amenable to restoration and enhancement. This reality is reflected both in the definition of conservation areas (areas whose 'character or appearance it is desirable to preserve or enhance') and in current practice in the conservation of historic landscapes.
- Communal Value
54. Communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical (particularly associative) and aesthetic values, but tend to have additional and specific aspects.
55. Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it. The most obvious examples are war and other memorials raised by community effort, which consciously evoke past lives and events, but some buildings and places, such as the Palace of Westminster, can symbolise wider values. Such values tend to change over time, and are not always affirmative. Some places may be important for reminding us of uncomfortable events, attitudes or periods in England's history. They are important aspects of collective memory and identity, places of remembrance whose meanings should not be forgotten. In some cases, that meaning can only be understood through information and interpretation, whereas, in others, the character of the place itself tells most of the story.
56. Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them. They tend to gain value through the resonance of past events in the present, providing reference points for a community's identity or sense of itself. They may have fulfilled a community function that has generated a deeper attachment, or shaped some aspect of community behaviour or attitudes. Social value

can also be expressed on a large scale, with great time-depth, through regional and national identity.

57. The social values of places are not always clearly recognised by those who share them, and may only be articulated when the future of a place is threatened. They may relate to an activity that is associated with the place, rather than with its physical fabric. The social value of a place may indeed have no direct relationship to any formal historical or aesthetic values that may have been ascribed to it.
58. Compared with other heritage values, social values tend to be less dependent on the survival of historic fabric. They may survive the replacement of the original physical structure, so long as its key social and cultural characteristics are maintained; and can be the popular driving force for the re-creation of lost (and often deliberately destroyed or desecrated) places with high symbolic value, although this is rare in England.
59. Spiritual value attached to places can emanate from the beliefs and teachings of an organised religion, or reflect past or present-day perceptions of the spirit of place. It includes the sense of inspiration and wonder that can arise from personal contact with places long revered, or newly revealed.

60. Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there.

Local Policy

The Epsom and Ewell Local Plan 2000 has been superseded by the Core Strategy and associated documents outlined below, and is now not used for the determination of planning applications by the council.

Epsom and Ewell Borough Council, Core Strategy 2007

This document forms part of the local development framework and contains the following policies of relevance:

Policy CS 5 The Council will protect and seek to enhance the Borough's heritage assets including historic buildings, conservation areas, archaeological remains, ancient monuments, parks and gardens of historic interest, and other areas of special character. The settings of these assets will be protected and enhanced.

High quality and inclusive design will be required for all developments. Development should:

- create attractive, functional and safe public and private environments;
- reinforce local distinctiveness and complement the attractive characteristics of the Borough;
- make efficient use of land and have regard to the need to develop land in a comprehensive way.

Epsom and Ewell Borough Council, Development Management Policies 2015

This document forms part of the local development framework and contains the following policies of relevance:

Policy DM8 Heritage Assets

We will resist the loss of our Heritage Assets and every opportunity to conserve and enhance them should be taken by new development. Development proposals that involve, or have an effect upon Heritage Assets must establish the individual significance of the Asset as part of the application or consent process. As part of the assessment process the significance of the Asset will be taken into account (namely whether it is a designated Heritage Asset* or a non-designated Heritage Asset) when determining whether the impact of any proposed development is acceptable. Within Areas of High Archaeological Potential, as identified on the Proposals Map, or outside of these areas on any major development site of 0.4ha or greater, applicants are required to undertake prior assessment of the possible archaeological significance of the site and the implications of their proposals, and may be required to submit, as a minimum, a desk-based assessment to accompany any application. Where desk-based assessment suggests the likelihood of archaeological remains, the Planning Authority will require the results of an archaeological evaluation in order to inform the determination of the application. We will from time to time review our Heritage Assets included on the Local Lists, with regard to the Historic Environment Record, in consultation with Surrey County Council. * Designated Heritage Assets comprise the following: Scheduled Ancient Monuments; Listed Buildings; Registered Parks

and Gardens and Conservation Areas. Non-designated Heritage Assets identified by the Council are those buildings and structures identified as being of local importance and veteran trees.

Policy DM9 Townscape Character and Local Distinctiveness

We will use the Conservation Area Appraisals and Environmental Character Study to guide the assessment of development proposals. We will seek enhancement of the townscape through new development, particularly those areas with poorer environmental quality and where the character has been eroded or needs improving. Planning permission will be granted for proposals which make a positive contribution to the Borough's visual character and appearance. In assessing this we will consider all of the following: • compatibility with local character and the relationship to the existing townscape and wider landscape; • the surrounding historic and natural environment; • the setting of the proposal site and its connection to its surroundings; and • the inclusion of locally distinctive features and use of appropriate materials.

Policy DM 10 Design Requirements for New Developments (including House Extensions)

Development proposals will be required to incorporate principles of good design. The most essential elements identified as contributing to the character and local distinctiveness of a street or area which should be respected, maintained or enhanced include, but are not limited, to the following: (i) prevailing development typology, including housing types and sizes; (ii) prevailing density of the surrounding area; (iii) scale, layout, height, form (including roof forms), massing; (iv) plot width and format which includes spaces between buildings; (v)

building line; and (vi) typical details and key features such as roof forms, window format, building materials and design detailing of elevations, existence of grass verges etc. Development proposals should also: (vii) be adaptable and sustainability designed, subject to aesthetic considerations; (viii) incorporate the principles of safe design to reduce the risk and fear of crime, e.g. natural surveillance, appropriate levels of lighting; (ix) have regard to the amenities of occupants and neighbours, including in terms of privacy, outlook, sunlight/daylight, and noise and disturbance; (x) ensure that the development incorporates an appropriate layout and access arrangements for servicing the completed development from adjoining highway and pedestrian networks; (xi) where appropriate their design and layout must not prejudice the development potential for similar proposals on neighbouring plots; (xii) have regard to the public realm and to ways in which it can be enhanced as an integral part of the design of the development; and (xiii) avoid locating structures, including, e.g. telecommunications equipment and building plant where they will be visually intrusive and likely to result in an adverse effect on the character and visual amenities of the local and wider area.

Policy DM 11 Housing Density

We will, in principle, support proposals for new housing that make the most efficient use of development sites located within the Borough's existing urban area. Proposals for new housing must demonstrate how the density of development would contribute towards maintaining and enhancing the visual character and appearance of the wider townscape and lead to no net loss of biodiversity. The density of new housing developments will in most cases not exceed 40 dwellings per hectare. We will consider exceptions to this approach

where: • The development site has been identified in the Site Allocations Policies Document as being appropriate for a higher density; or • It can be demonstrated that the site enjoys good access to services, facilities and amenities via existing public transport, walking and cycling networks; and • The surrounding townscape has sufficient capacity to accommodate developments of higher density.

Other Relevant Supplementary Planning Documents and Guidance

Epsom & Ewell Borough Council, Woodcote Conservation Area Appraisal (2010)

Epsom & Ewell Borough Council, Chalk Lane Conservation Area Appraisal (2010)

Epsom & Ewell Borough Council, Stamford Green Conservation Area Appraisal (2009)

Epsom and Ewell Borough Council Environmental Character Study (2008)

Appendix III – Miller Hare Verified Views and Methodology



View 1 proposed



View 2 proposed



View 3 proposed



View 4 proposed



View 5 proposed



View 6 proposed



View 7 proposed



View 8 proposed



View 9 proposed



View 10 proposed



View 11 proposed



View 12 proposed



View 13 proposed



View 14 proposed



View 15 proposed

Appendices (continued)

A4 Accurate Visual Representations

A4.1 Each of the views in this study has been prepared as an Accurate Visual Representation (AVR) following a consistent methodology and approach to rendering. Appendix C of the London View Management Framework: Supplementary Planning Guidance (March 2012) defines an AVR as:

"An AVR is a static or moving image which shows the location of a proposed development as accurately as possible; it may also illustrate the degree to which the development will be visible, its detailed form or the proposed use of materials. An AVR must be prepared following a well-defined and verifiable procedure and can therefore be relied upon by assessors to represent fairly the selected visual properties of a proposed development. AVRs are produced by accurately combining images of the proposed building (typically created from a three-dimensional computer model) with a representation of its context; this usually being a photograph, a video sequence, or an image created from a second computer model built from survey data. AVRs can be presented in a number of different ways, as either still or moving images, in a variety of digital or printed formats."

A4.2 In this study the baseline condition is provided by carefully taken large format photography. The proposed condition is represented as an accurate photomontage, which combines a computer generated image with the photographic context. In preparing AVRs of this type certain several key attributes need to be determined, including:

- the Field of View
- the representation of the Proposed Development
- documentation accompanying the AVR

Selection of Field of View

A4.3 The choice of telephoto, standard or wide-angle lens, and consequently the Field of View, is made on the basis of the requirements for assessment which will vary from view to view.

A4.4 In the simple case the lens selection will be that which provides a comfortable Viewing Distance. This would normally entail the use of what most photographers would refer to as a "standard" or "normal" lens, which in practice means the use of a lens with a 35mm equivalent focal length of between about 40 and 58 mm.

A4.5 However in a visual assessment there are three scenarios where constraining the study to this single fixed lens combination would not provide the assessor with the relevant information to properly assess the Proposed Development in its context.

Field Of View

The term 'Field Of View' (FOV) or more specifically Horizontal Field of View (HFOV), refers to the horizontal angle of view visible in a photograph or printed image and is expressed in degrees. It is often generally referred to as 'angle of view', 'included angle' or 'view cone angle'.

Using this measure it becomes practical to make a comparison between photographs taken using lens of various focal lengths captured on to photographic film or digital camera sensors of various size and proportions. It is also possible to compare computer renderings with photographic images.

Studies of this type use a range of camera equipment; in recent times digital cameras have largely superseded the traditional film formats of 35mm, medium format (6cm x 6cm) and large format (5in x 4in). Comparing digital and film formats may be achieved using either the HFOV or the 35mm equivalent lens calculation, however quoting the lens focal length (in mm) is not as consistently applicable as using the HFOV when comparing AVRs.

35mm Lens	HFOV degrees	Lens focal length (mm)
Wide angle lens	74.0	24
Medium wide lens	54.4	35
Telephoto lens	28.8	70
Telephoto lens	20.4	100
Telephoto lens	10.3	200
Telephoto lens	6.9	300

The FOV of digital cameras is dependent on the physical dimensions of the CCD used in the camera. These depend on the make and model of the camera. The comparison table uses the specifications for a Canon EOS-5D Mark II which has CCD dimensions of 36.0mm x 22.0mm.

A4.6 Firstly, where the relationship being assessed is distant, the observer would tend naturally to focus closely on it. At this point the observer might be studying as little as 5 to 10 degrees in plan. The printing technology and image resolution of a print limit the amount of detail that can be resolved on paper when compared to the real world, hence in this situation it is appropriate to make use of a telephoto lens.

A4.7 Secondly, where the wider context of the view must be considered and in making the assessment a viewer would naturally make use of peripheral vision in order to understand the whole. A print has a fixed extent which constrains the angle of view available to the viewer and hence it is logical to use a wide angle lens in these situations in order to include additional context in the print.

A4.8 Thirdly where the viewing point is studied at rest and the eye is free to roam over a very wide field of view and the whole setting of the view can be examined by turning the head. In these situations it is appropriate to provide a panorama comprising of a number of photographs placed side by side.

A4.9 For some views two of these scenarios might be appropriate, and hence the study will include two versions of the same view with different fields of view.

Representation of the Proposed Development and cumulative schemes

Classification of AVRs

A4.10 AVRs are classified according to their purpose using Levels 0 to 3. These are defined in detail in Appendix C of the London View Management Framework: Supplementary Planning Guidance (July 2007). The following table is a summary.

AVR level	showing	purpose
AVR 0	Location and size of proposal	Showing Location and size
AVR 1	Location, size and degree of visibility of proposal	Confirming degree of visibility
AVR 2	As level 1 + description of architectural form	Explaining form
AVR 3	As level 2 + use of materials	Confirming the use of materials

A4.11 In practice the majority of photography based AVRs are either AVR 3 (commonly referred to as "fully rendered" or "photoreal") or AVR 1 (commonly referred to as "wire-line"). Model based AVRs are generally AVR 1.

AVR 3 – Photoreal



Example of AVR 3 – confirming the use of materials (in this case using a 'photo-realistic' rendering technique)

A4.12 The purpose of a Level 3 AVR is to represent the likely appearance of the Proposed Development under the lighting conditions found in the photograph. All aspects of the images that are able to be objectively defined have been created directly from a single detailed description of the building. These include the geometry of the building and the size and shape of shadows cast by the sun.

A4.13 Beyond this it is necessary to move into a somewhat more subjective arena where the judgement of the delineator must be used in order to define the final appearance of the building under the specific conditions captured by the photographic and subsequent printing processes. In this area the delineator is primarily guided by the appearance of similar types of buildings at similar distances in the selected photograph. In large scope studies photography is necessarily executed over a long period of time and sometimes at short notice. This will produce a range of lighting conditions and photographic exposures. The treatment of lighting and materials within these images will respond according to those in the photograph.

A4.14 Where the Proposed Development is shown at night-time, the lightness of the scheme and the treatment of the materials was the best judgment of the visualiser as to the likely appearance of the scheme given the intended lighting strategy and the ambient lighting conditions in the background photograph. In particular the exact lighting levels are not based on photometric calculations and therefore the resulting image is assessed by the Architect and Lighting Designer as being a reasonable interpretation of the concept lighting strategy.

Appendices (continued)

AVR 1 – Outline



Example of AVR 1 confirming degree of visibility (in this case as an occluded 'wire-line' image)

A4.15 The purpose of a wire-line view is to accurately indicate the location and degree of visibility of the Proposed Development in the context of the existing condition and potentially in the context of other proposed schemes.

A4.16 In AVR1 representation each scheme is represented by a single line profile, sometimes with key edges lines to help understand the massing. The width of the profile line is selected to ensure that the diagram is clear, and is always drawn inside the true profile. The colour of the line is selected to contrast with the background. Different coloured lines may be used in order to distinguish between proposed and consented status, or between different schemes.

A4.17 Where more than one scheme is represented in outline form the outlines will obscure each other as if the schemes were opaque. Trees or other foliage will not obscure the outline of schemes behind them. This is because the transparency of trees varies with the seasons, and the practical difficulties of representing a solid line behind a filigree of branches. Elements of a temporary nature (e.g. cars, tower cranes, people) will similarly not obscure the outlines.

Framing the view

A4.18 Typically AVRs are composed with the camera looking horizontally i.e. with a horizontal Optical Axis. This is in order to avoid converging verticals which, although perspective correct, appear to many viewers as unnatural in print form. The camera is levelled using mechanical levelling devices to ensure the verticality of the Picture Plane, being the plane on to which the image is projected; the film in the case of large format photography or the CCD in the case of digital photography.

A4.19 For a typical townscape view, a Landscape camera format is usually the most appropriate, giving the maximum horizontal angle of view. Vertical rise may be used in order to reduce

the proportion of immediate foreground visible in the photograph. Horizontal shift will not be used. Where the prospect is framed by existing buildings, portrait format photographs may be used if this will result in the proposal being wholly visible in the AVR, and will not entirely exclude any relevant existing buildings.

A4.20 Where the Proposed Development would extend off the top of the photograph, the image may be extended vertically to ensure that the full height of the Proposed Development is shown. Typically images will be extended only where this can be achieved by the addition of sky and no built structures are amended. Where it is necessary to extend built elements of the view, the method used to check the accuracy of this will be noted in the text.

Documenting the AVR

Border annotation

A4.21 A Millerhore AVR image has an annotated border or 'graticule' which indicates the field of view, the optical axis and the horizon line. This annotation helps the user to understand the characteristics of the lens used for the source photograph, whether the photographer applied tilt, vertical rise or horizontal shift during the taking of the shot and if the final image has been cropped on one or more sides.

A4.22 The four red arrows mark the horizontal and vertical location of the 'optical axis'. The optical axis is a line passing through the eye point normal to the projection plane. In photography this line passes through the centre of the lens, assuming that the film plane has not been tilted relative to the lens mount. In computer rendering it is the viewing vector, i.e. the line from the eye point to the target point.

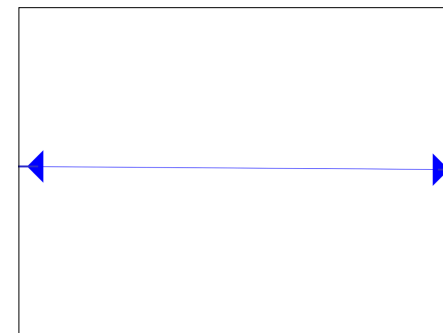
A4.23 If the point indicated by these marks lies above or below the centre of the image, this indicates either that vertical rise was used when taking the photograph or that the image has subsequently been cropped from the top or bottom edge. If it lies to the left or right of the centre of the image then cropping has been applied to one side or the other, or more unusually that horizontal shift was applied to the photograph.



Sample graticule showing optical axis markers

A4.24 The vertical and horizontal field of view of the final image is declared using a graticule consisting of thick lines at ten degree increments and intermediate lines every degree, measured away from the optical axis. Using this graticule it is possible to read off the resultant horizontal and vertical field of view, and thereby to compare the image with others taken using specific lens and camera combinations. Alternatively it can be used to apply precise crops during subsequent analysis.

A4.25 The blue marks on the left and right indicate the calculated location of the horizon line i.e. a plane running horizontally from the location of the camera. Where this line is above or below the optical axis, this indicates that the camera has been tilted; where it is not parallel with the horizontal marking of the optical axis, this indicates that the camera was not exactly horizontal, i.e. that "roll" is present. Note that a small amount of tilt and roll is nearly always present in a photograph, due to the practical limitations of the levelling devices used to align the camera in the field.



Sample graticule showing horizon line markers

Comparing AVRs with different FOVs

A4.26 A key benefit of the index markings is that it becomes practical to crop out a rectangle in order to simulate the effect of an image with a narrower field of view. In order to understand the effect of using a longer lens it is simply necessary to cover up portions of the images using the graticule as a guide.

Appendices (continued)

A5 Methodology for the production of Accurate Visual Representations

Overview of Methodology

A5.1 The study was carried out by Millerhare (the Visualiser) by combining computer generated images of the Proposed Development with either large format photographs or with rendered images from a context model at key strategic locations around the site as agreed with the project team. Surveying was executed by Absolute Survey (the Surveyor).

A5.2 The methodology employed by Millerhare is compliant with Appendix C of the London View Management Framework: Supplementary Planning Guidance (March 2012) and Landscape Institute Advice Note 01/11.

A5.3 The project team defined a series of locations in London where the proposed buildings might have a significant visual effect. At each of these locations Millerhare carried out a preliminary study to identify specific Assessment Points from which a representative and informative view could be taken. Once the exact location had been agreed by the project team, a photograph was taken which formed the basis of the study. The precise location of the camera was established by the Surveyor using a combination of differential GPS techniques and conventional observations.

A5.4 For views where a photographic context was to be used additional surveying was carried out. A number of features on existing structures visible from the camera location were surveyed. Using these points, Millerhare has determined the appropriate parameters to permit a view of the computer model to be generated which exactly overlays the appropriate photograph. Each photograph has then been divided into foreground and background elements to determine which parts of the current context should be shown in front of the Proposed Development and which behind. When combined with the computer-generated image these give an accurate impression of the impact of the Proposed Development on the selected view in terms of scale, location and use of materials (AVR Level 3).

Spatial framework and reference database

A5.5 All data was assembled into a consistent spatial framework, expressed in a grid coordinate system with a local plan origin. The vertical datum of this framework is equivalent to Ordnance Survey (OS) Newlyn Datum.

A5.6 By using a transformation between this framework and the OSGB36 (National Grid) reference framework, Millerhare have been able to use other data sets (such as OS land line maps and ortho-corrected aerial photography) to test and document the resulting photomontages.

A5.7 In addition, surveyed observation points and line work from Millerhare's London Model database are used in conjunction with new data in order to ensure consistency and reliability.

A5.8 The models used to represent consented schemes have been assembled from a variety of sources. Some have been supplied by the original project team, the remainder have been built by Millerhare from available drawings, generally paper copies of the submitted planning application. While these models have not been checked for detailed accuracy by the relevant architects, Millerhare has used its best endeavours to ensure that the models are positioned accurately both in plan and in overall height.

Process – photographic context

Reconnaissance

A5.9 At each Study Location the Visualiser conducted a photographic reconnaissance to identify potential Assessment Points. From each candidate position, a digital photograph was taken looking in the direction of the Proposed Development using a wide angle lens. Its position was noted with field observations onto an OS map and recorded by a second digital photograph looking at a marker placed at the Assessment Point.

A5.10 In the situation where, in order to allow the appreciation of the wider setting of the proposal, the assessor requires more context than is practical to capture using a wide angle lens, multiple photographs may be combined to create a panorama, typically as a diptych or triptych. This will be prepared by treating each panel as a separate AVR and then combining in to a single panorama as a final process.

A5.11 The Visualiser assigned a unique reference to each Assessment Point and Photograph.

Final Photography

A5.12 From each selected Assessment Point a series of large format photographs were taken with a camera height of approximately 1.6m. The camera, lens, format and direction of view are determined in accordance with the policies set out above

A5.13 Where a panoramic view is specified the camera/tripod head is rotated through increments of 40 degrees to add additional panels to the left and/or right of the main view.

A5.14 The centre point of the tripod was marked and a digital photograph showing the camera and tripod in situ was taken to allow the Surveyor to return to its location. Measurements and field notes were also taken to record the camera location, lens used, target point and time of day.

Surveying the Assessment Points

A5.15 For each selected Assessment Point a survey brief was prepared, consisting of the Assessment Point study sheet and a marked up photograph indicating alignment points to be surveyed. Care was taken to ensure that a good spread of alignment points was selected, including points close to the camera and close to the target.

A5.16 Using differential GPS techniques the Surveyor established the location of at least two intervisible stations in the vicinity of the camera location. A photograph of the GPS antenna in situ was taken as confirmation of the position.

A5.17 From these the local survey stations, the requested alignment points were surveyed using conventional observation.

A5.18 The resulting survey points were amalgamated into a single data set by the Surveyor. This data set was supplied as a spreadsheet with a set of coordinates transformed and re-projected into OSGB36 (National Grid) coordinates, and with additional interpreted lines to improve the clarity of the surveyed data.

A5.19 From the point set, the Visualiser created a three dimensional alignment model in the visualisation system by placing inverted cones at each surveyed point.

Photo preparation

A5.20 From the set of photographs taken from each Assessment Point, one single photograph was selected for use in the study. This choice was made on the combination of sharpness, exposure and appropriate lighting.

A5.21 The selected photograph was copied into a template image file of predetermined dimensions. The resulting image was then examined and any artefacts related to the digital image capture process were rectified.

A5.22 Where vertical rise has been used the image is analysed and compensation is applied to ensure that the centre of the image corresponds to the location of the camera's optical axis.

Calculating the photographic alignment

A5.23 A preliminary view definition was created within the visualisation system using the surveyed camera location, recorded target point and FOV based on the camera and lens combination selected for the shot

A5.24 A lower resolution version of the annotated photograph was attached as a background to this view, to assist the operator to interpret on-screen displays of the alignment model and other relevant datasets.

A5.25 Using this preliminary view definition, a rendering was created of the alignment model at a resolution to match the scanned photograph. This was overlaid onto the background image to compare the image created by the actual camera and its computer equivalent. Based on the results of this process adjustments were made to the camera definition. When using a wide angle lens observations outside the circle of distortion are given less weighting.

A5.26 This process was iterated until a match had been achieved between the photograph and alignment model. At this stage, a second member of staff verified the judgements made. An A3 print was made of the resulting photograph overlaid with the

alignment model as a record of the match. This was annotated to show the extents of the final views to be used in the study.



Example of alignment model overlaid on the photograph

Preparing models of the Proposed Development

A5.27 A CAD model of the Proposed Development was created from 3D CAD models and 2D drawings supplied by the Architect. The level of detail applied to the model is appropriate to the AVR type of the final images.

A5.28 Models of the Proposed Development and other schemes are located within the spatial framework using reference information supplied by the Architect or, when not available, by best fit to other data from the spatial framework reference database. Study renders of the model are supplied back to the Architect for confirmation of the form and the overall height of the Proposed Development. The method used to locate each model is recorded. Each distinct model is assigned a unique reference code by the Visualiser.

Determining occlusion and creating simple renderings

A5.29 A further rendering was created using the aligned camera, which combined the Proposed Development with a computer-generated context. This was used to assist the operator to determine which parts of the source image should appear in front of the Proposed Development and which behind it. Using this image and additional site photography for information, the source file is divided into layers representing foreground and background elements.

A5.30 In cases where the Proposed Development is to be represented in silhouette or massing form (AVR1 or AVR2), final renderings of an accurate massing model were generated and inserted into the background image file between the foreground and background layers.

A5.31 Final graphical treatments were applied to the resulting image as agreed with the Architect and environmental and planning consultants. These included the application of coloured outlines to clarify the reading of the images or the addition of tones to indicate occluded areas.

Appendices (continued)

Creating more sophisticated renderings

A5.32 Where more sophisticated representations of the Proposed Developments were required (AVR3) the initial model is developed to show the building envelope in greater detail. In addition, definitions were applied to the model to illustrate transparency, indicative material properties and inter-reflection with the surrounding buildings.

A5.33 For each final view, lighting was set in the visualisation system to match the theoretical sunlight conditions at the time the source photograph was taken, and additional model lighting placed as required to best approximate the recorded lighting conditions and the representation of its proposed materials.

A5.34 By creating high resolution renderings of the detailed model, using the calculated camera specification and approximated lighting scenario, the operator prepared an image of the building that was indicative of its likely appearance when viewed under the conditions of the study photograph. This rendering was combined with the background and foreground components of the source image to create the final study images.

A5.35 A single CAD model of the Proposed Development has been used for all distant and local views, in which the architectural detail is therefore consistently shown. Similarly a single palette of materials has been applied. In each case the sun angles used for each view are transferred directly from the photography records.

A5.36 Material definitions have been applied to the models assembled as described. The definitions of these materials have been informed by technical notes on the planning drawings and other available visual material, primarily renderings created by others. These resulting models have then been rendered using the lighting conditions of the photographs.

A5.37 Where the Proposed Development is shown at night-time, the lightness of the scheme and the treatment of the materials was the best judgment of the visualiser as to the likely appearance of the scheme given the intended lighting strategy and the ambient lighting conditions in the background photograph.

A5.38 Where a panoramic view is specified each panel is prepared by treating each photograph as an individual AVR following the process described in the previous paragraphs. The panels are then arranged side by side to construct the panorama. Vertical dividers are added to mark the edge of each panel in order to make clear that the final image has been constructed from more than one photograph.

Documenting the study

A5.39 For each Assessment Point a CAD location plan was prepared, onto which a symbol was placed using the coordinates of the camera supplied by the Surveyor. Two images of this symbol

were created cross-referencing background mapping supplied by Ordnance Survey.

A5.40 The final report on the Study Location was created which shows side by side, the existing and proposed prospect. These were supplemented by images of the location map, a record of the camera location and descriptive text. The AVR level is described.

A5.41 Peripheral annotation was added to the image to clearly indicate the final FOV used in the image, any tilt or rise, and whether any cropping has been applied.

A5.42 Any exceptions to the applied policies or deviations from the methodology were clearly described.

A5.43 Where appropriate, additional images were included in the study report, showing the Proposed Development in the context of other consented schemes.

