



Heritage Topic Paper

March 2025



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1. Introduction

- 1.1. Paragraph 196 of the National Planning Policy Framework (NPPF) (20 December 2023) states that plans should set out a positive strategy for the conservation and the enjoyment of the historic environment.¹
- 1.2. This Topic Paper is intended to:
 - demonstrate how Epsom and Ewell Borough Council, through the development of the Epsom and Ewell Local Plan 2022-2040 has evaluated the historic environment of the borough both holistically, and, through Heritage Impact Assessments of site allocations, in more detail, demonstrating an understanding of the context of the borough.
 - explain how, through policy, guidance and legislation, it will seek to conserve and enhance the historic environment throughout the plan period. Taken together, this paper asserts that these steps demonstrate a positive strategy for the conservation and enjoyment of the historic environment.
- 1.3. This topic paper is one in a series of papers that sets out how the key strategies and themes of the Proposed Submission Epsom & Ewell Local Plan have been developed.
- 1.4. Each topic paper considers relevant national and local guidance that informed the development of the Epsom & Ewell Local Plan. The topic papers set out how the strategy, policies and allocations have developed in relation to the guidance, in addition to local evidence, and consultation feedback.
- 1.5. The topic papers do not contain any policies, proposals, or site allocations. The topic papers are intended to be ‘living’ documents, which will be updated throughout the plan-making process in order to reflect updated evidence, changes to the policy context, and the outcomes of the various stages of consultation and engagement.

¹ [\[ARCHIVED CONTENT\]](#) NPPF December 2023

2. Evaluating context: The historic significance of Epsom and Ewell

- 2.1. Epsom came into existence as a Saxon settlement in the 5th or 6th century. It is mentioned in the Domesday Book of 1086 and continued as a small agricultural settlement until, early in the 17th century, medicinal water was identified in a well on the Common. At this time Ewell was bigger than Epsom.
- 2.2. From the mid-17th century Epsom Wells and Spa became a fashionable and popular place for the wealthy to visit. After the decline of its spa Epsom sank so much in importance that in the early years of the 19th century it was being described as a village rather than a town. The population of Epsom in 1801 was circa 2,400.
- 2.3. However, the growing popularity of horse racing continued to bring visitors to the town and Epsom remained an important place on coaching routes to London (it took 2 ½ hours to travel the 17 miles to London).
- 2.4. The railway first reached the town in 1847 when an extension of the London, Brighton & South Coast Railway from West Croydon was opened with a terminus just east of the town. Station Road (renamed Upper High Street in 1939) was laid out to meet it. By 1868, on the completion of Victoria Station, Epsom has a reasonably direct and fast line to London.
- 2.5. In 1859 the London & South Western Railway built their own station off Waterloo Road, along what is now the Waterloo line. Epsom Downs station opened in 1865 enabling many more people to attend the races.
- 2.6. Easier access, particularly from London, stimulated trade and also encouraged middleclass commuters to build houses in Epsom. More working and middle class people were attracted to the area and it increasingly became an urban community. A population of circa 3,800 in 1851 had grown to circa 7,800 by 1891. Much of the late 19th century expansion of the town took place to the east of the town centre. Over the next fifty years, the railways, improvements in public health, racing and the town's position as a shopping centre for surrounding area brought prosperity to Epsom.
- 2.7. Epsom Urban District Council was set up in 1894. Electricity became available in 1902. The town grew slowly during the first half of the 19th century. In 1824 St Martin's Church, the oldest building in Epsom, was rebuilt and enlarged to hold a congregation of 1,120. The Epsom and Ewell Gas Company was set up in 1839. The present clock tower in the High Street was built in 1848.
- 2.8. In the early 1840s the town was a quiet, rural place with about 570 houses but the coming of the railways in the late 1840s brought in a whole new period of growth and development.
- 2.9. For more detail on each of the conservation areas including, architectural and townscape significance, please refer to the conservation area appraisals.

Archaeological Significance

- 2.10. There are three categories of sites of archaeological significance: scheduled ancient monuments, County sites of archaeological importance, and areas of high archaeological potential.
- 2.11. The schedule of ancient monuments in Epsom and Ewell are:
- The Site of Nonsuch Palace and its associated remains; and
 - St Mary's Church Tower in Ewell.
- 2.12. There is also a County Site of Archaeological Importance (CSAI):
- Diana's Dyke, close to Nonsuch Palace
- 2.13. There are also areas of High Archaeological Potential:
- Roman tile kiln, West Park Hospital, Horton
 - Horton Manor Moated Site, Stamford Green
 - Medieval Occupation Site, Horton Lane, Ewell
 - Epsom – Historic Town Core
 - Bronze Age Auroch findspot, adjacent Burgh Heath Road, Epsom
 - Former earthwork field system, Walton Downs
 - Iron Age/Romano-British farmstead, North Looe
 - Saxon burial site, Cuddington
 - Late Roman inhumation and cremation burials, Ewell
 - Ewell - Historic Town Core
 - Early Iron Age Occupation, South Nonsuch Park, Ewell
 - Nonsuch Palace, Nonsuch Park, Ewell
 - Stable Block, Nonsuch Palace, Cuddington
 - Gunpowder Mills, Hogsmill River, Ewell
 - Horton Cemetery, off Hook Road, Epsom
 - Iron Age, Roman and Medieval activity, near Cuddington Community Primary School, Worcester Park
- 2.14. Details of County Sites of Archaeological Importance and Areas of High Archaeological Potential are included in the County Historic Environment Record and are captured on the Council's [GIS system](#) for Development Management purposes.

Agricultural significance

- 2.15. The Borough sits on the dip slope of the North Downs, with their light chalk soils worked as open fields from late Saxon times for the manors of Cuddington, Ewell and Epsom. Later in the Middle Ages the fields to the north, on the London Clay at Ruxley and Horton, were hedged and banked for cash crops and cattle grazing. The lands of Cuddington were enclosed for Nonsuch Park and lost to agriculture until dispersing in 1731, when they were divided up among several farms.
- 2.16. Ewell followed suit with enclosure in 1801 but Epsom remained open field until 1870, as there were more proprietors and the lord of the manor did not want to see land released for development. This restriction meant that streets including Wyeths Road and Carters Road had to be built within the boundaries of an acre strip.

- 2.17. Originally, farms were based within the settlements, such as those in Ewell's Church Street and West Street: after enclosure, new farmhouses were built in isolation among the fields. With the coming of the railways, agriculture became specialised for the London market.
- 2.18. Herbs were grown at Nonsuch Court Farm and a dairy herd kept at Fitznells Farm; market gardening flourished and Young followed by Dods ran the nursery hardens off East Street which grew the first commercial bananas in England. Other nurseries supplied the needs of new housing development and off Reigate Road smallholdings were built by Surrey County Council for unemployed soldiers returning from World War 1. Mayfield Lavender Farm, next to this land, is the last remaining area of tillage in the Borough but agricultural heritage can still be seen in the surviving barns of Axwood, Woodcote Park and Rectory Farm, and the farmhouses: some still standing alone like Fitznells, Horton, Longdown and North Looe, others embedded in later development like Ewell Court Farm at 156 Ewell Bypass.

Artistic, cultural and religious significance

- 2.19. Situated in rolling scenery within easy access of London, Epsom and Ewell both appealed to artists who had connections with the area. John Constable was a guest at Hylands House from 1805 to 1811 and later visited Pitt Place, owned by his friend the amateur artist Digby Neave. Family links also brought in the Pre-Raphaelites: William Holman Hunt had an uncle farming in the village and John Everett Millais knew the Lemprières at Manor House in Cheam Road. A long stay in 1851 led to Millais' *Ophelia* and Hunt's *The Hireling Shepherd* and *The Light of the World*. Millais also painted at the Derby – part of its development from a subject for racing artists (Henry Alken was there in the 1810s and James Pollard until the 1830s) to an inexhaustible source of genre scenes. William Frith's *Derby Day* exhibited at the Royal Academy in 1858, the first painting in a generation to need a rail protecting it from the crowds. Alfred Munnings in the 1920s and Laura Knight in the 1930s both attended the race not for its horses but for people, especially the Gypsies.
- 2.20. After the War, Epsom Downs and Common continued to provide an open-air resource for students under David Birch, Principal from 1930 to 1961 of the Epsom School of Art (now part of the University of the Creative Arts). The growth of technical training provided a base for artists who would previously have been freelance, and Frank Hampson concluded his career teaching at NESOT, although his best work had been done preparing immaculate master drawings for the *Eagle* when the comic was produced from 1a College Avenue.

Military Significance

- 2.21. The road from Epsom to London lines up with the Dorking Gap, one of the few points where the scarp of the North Downs, otherwise a natural defence against invasion, is vulnerable to incursions of troops from the south coast. In 1779 lines of encampment on Epsom Downs were surveyed during troop movements but the French did not materialise. In Capt. Chesney's fictional *Battle of Dorking* (1871) it is the German Empire which storms through the gap, followed by scenes of chaos at Epsom. This novel founded a genre of invasion scares, leading to the creation of local Rifle Volunteers

(their Drill Hall was in East Street). In the First World War the Borough's main military use was as open space. Tadworth Camp, which stretched southwards from the Downs, trained men in trench warfare and gas attacks, while Woodcote Park was made over to the volunteer University and Public Schools Brigade. In 1916 the Brigade was sent to the Somme, where it was largely annihilated: after this the camp was converted for convalescent soldiers, mostly from Australia and Canada.

- 2.22. In 1939, Home Guard troops returned to the Downs for training space but aerial warfare had changed the geography of combat and Epsom was once again vulnerable: in Hitler's Operation Sealion gliders were to land here, releasing advance troops to forestall resistance against the forces moving in from the coast. In response, an Outer London Defence Line was established along the raised Epsom–Cheam railway embankment, with blocks at every road bridge. Aerial bombardment threatened civilians for the first time and mass shelters were dug off Ashley Road and in the Downs, although in practice most protection came from the Anderson shelters distributed to all houses with gardens. Planning for the Third World War was purely defensive and focussed on shelters, first at and then under Town Hall. Most defensive works in the Borough were restored in peacetime, such as the anti-glider trenches in Nonsuch Park, but tank-traps from the Outer London Defence Line still exist at the choke-point of the Drift Bridge and at an unguarded section in Manor Park.

Political Significance

- 2.23. Epsom was a centre for political activity long before it became a Parliamentary constituency. When racing was a predominantly aristocratic sport, meetings including the Derby were used as an opportunity for informal politics, and the town was one of the polling centres for Surrey MPs: in 1788 Sir Joseph Mawbey attributed his failure to win the county seat to the bungling of his triumphant entry into the town. From 1832 onwards the old system of separate county and borough seats was replaced by regional divisions and in 1885 Epsom became a constituency, faithfully returning Conservative members, although in 1906, the year of the Liberal landslide, Alfred Aston stood for the party and came close to unseating the sitting MP, William Keswick; he was put up to it by the former Prime Minister Lord Rosebery, who had retired to the Durdans.
- 2.24. Although there were no party candidates, until 1933 Epsom Urban District leaned towards the left while the surrounding Epsom Rural District (of which Ewell was only a part) was Conservative. Both councils had their headquarters within the town (respectively at Bromley Hurst in Church Street and at Ashley House), which led to some exchanges during the 1926 General Strike. James Chuter Ede, the most dynamic member of the Urban District from 1908 onwards, had to stand for a Labour seat as far off as South Shields, although he also worked in Surrey County Council and returned to Epsom in 1937 as Charter Mayor of the recently unified Epsom and Ewell.

Townscape significance

- 2.25. Epsom and Ewell has a pleasant blend of low density urban and rural character, perhaps best observed from the naturally elevated position south of the Borough, which offers comprehensive views over it and towards London. The concentration of development in the centre of the borough has evolved since the 19th century with the introduction of

railways from London and the leisure attractions it has offered people since this time. The town centre is thriving yet modest in size, benefitting from one of the best served railway stations outside of London. With some exceptions, the town itself is low rise and mostly concentric, with some notable landmarks (e.g. the clock tower) signalling its centre. This character has understandably led many, anecdotally, to describe the town centre as having a “market town” character.

- 2.26. The surrounding localities and villages, such as Ewell Village and Stoneleigh, all have individual character, the former a more compact and historic feel, the latter evolving from changes in shopping habits and car ownership to reflect the more modern approach to development from the 1930's. The townscape also offers good examples of the imaginative re-use of surplus brownfield Green Belt land in the northwest, at land known as the “Hospital Cluster”; a modern suburban development, which integrates some of the original features of the buildings well. Within built up areas, street scenes are softened by trees and grass verges which also contribute to the townscape's significance.
- 2.27. Between developed areas is a healthy array of open spaces, in the form of public parks (such as the Rosebery Park) and sports pitches. Even private open land contributes to the wellbeing of those who observe them either by virtue of public footpaths running through them or the visual contrast they offer in relation to surrounding buildings. In some cases, the open spaces in the borough have more intrinsic links to history than others, such as Nonsuch Park (the former site of a Tudor Palace commissioned by Henry VIII).
- 2.28. The intrinsic ecological benefit of open spaces, particularly sites of nature conservation importance to the southwest of the borough, also speak to the high value communities of Epsom and Ewell have given to the natural environment in the past.

Architectural Significance

- 2.29. The number of conservation areas for such a small borough is indicative of its varied and rich architectural significance. Whilst more modern buildings and housing estates have emerged throughout the borough with success, it still retains significant examples of traditional architecture. Of particular note are buildings built in the “Surrey Vernacular style,” inspired by Lutyens and the Arts and Crafts Movement such which can be found at Burgh Heath Road, Chalk Lane, College Road and the Ewell Downs among others. Buildings in the borough can also be traced to particular known architects such as Ernest Harwood and William Clifford Smith.
- 2.30. Other styles found in the borough are intrinsic of the wider southeast and London; from more ornate Italliante Villas or terraced houses and prestigious country residences to 18th and 19th century buildings which range in uniformity and construction. Timber frames, red brick, stone dressing, London stock brick and feather edged weatherboarding can all be found on buildings throughout the borough. Some are more decorative than others with Georgian facades, string courses, window architraves and other decorative features.

- 2.31. Materials used in buildings of significance in the borough range from those sourced locally (Clunch from local chalk pits in Chalk Lane and orange coloured brick from the old Kiln Lane Quarry at Nonsuch) and manufactured locally (such as handmade clay peg tiles) to more traditional materials sourced from further afield when transportation became more commonplace in the late 19th century. For example, Welsh Slate and the more unusual use of orange Clay Pantiles.
- 2.32. At the more modern end of the architectural spectrum the borough is proud to host buildings typical of more modern and experimental times. As well as the modernist (and Listed) Bourne Hall, many residential buildings in the 1960s were built with high quality materials, such as those on the Downs Road estate.
- 2.33. The Town Centre has retained its traditional and historically significant fine grain of development due to the survival of a high number of historic buildings within the town centre, and in turn a variety of shops, restaurants, pubs and other commercial uses that contribute to the vitality of it.
- 2.34. There is consistency in building heights of 2-3 storeys and a prevailing roofscape comprising hipped and pitched tile or slate roofs sometimes located behind parapets. Whilst red brick predominates there is some variety in the façade treatments within the conservation area with many buildings faced in painted render and examples of the use of applied timber framing, pargetting, stonework, weatherboarding, and terracotta. The townscape contributes positively to the character of the town centre as a pleasant and enjoyable place to visit.

3. Approach to conserving and enhancing the Historic Environment in Epsom and Ewell

The Local Plan

- 3.1. Acknowledging and understanding the rich historical context described above, the Council has considered that preserving the historic environment through the Local Plan must be one of its key objectives. As such, Objective 8, stemming from the vision of the Local Plan, will be read that its purpose is:

“to deliver high quality and sustainable buildings and places that integrate into their surroundings and respond to local heritage”

- 3.2. In addition, an overarching Strategic policy will set out the Councils approach to protecting the historic environment in strategic terms. As the majority of impacts on the historic environment will come development regulated under the Town and Country Planning Act, a more detailed policy designed to guide development management will support that strategic policy.
- 3.3. It is important that such policies are clear and accessible for all decision makers and interested parties to understand. Throughout the plan making process, officers have also had regard to paragraph 002 Reference ID: 61-002-20190315 which directs that *“while the content of plans will vary depending on the nature of the area and matters to be addressed, all plans need to be as focused, concise and accessible as possible”*.
- 3.4. Therefore, the new policies are more focused, concise and accessible. The new policies bring heritage policy into line with the National Planning Policy Framework and the terminology used in national guidance.
- 3.5. The Local Plan contains a strategic heritage policy – Policy S13: Preserving identity of place with heritage which is detailed below:

Policy S13: Preserving identity of place with heritage

- 1) Development will be permitted where as far as possible, it enhances the borough’s cultural, historic, architectural and townscape character.
- 2) The Council will seek to utilise mechanisms available through national policy and legislation, to protect the character of historic places and the significance of designated heritage assets, and uphold the principles upon which such protection has been justified.

- 3.6. Complementing Strategic Policy S13 is Policy DM13: Development Impacting Heritage Assets. Which is detailed below:

Policy DM13: Development Impacting Heritage Assets

- 1) Development proposals which have an impact on heritage assets will be permitted where they preserve or enhance them, their significance and/or their setting; or
- 2) Where proposals which impact but do not preserve and/or enhance heritage assets, clear and convincing justification of that impact will need to be provided, in accordance with the decision-making approach directed by the National Planning Policy Framework, Planning Practice Guidance or relevant revision.

- 3.7. The policies make clear the need to understand the significance of heritage assets when planning proposals are submitted for determination and clearly indicate the need to provide an appropriate level of detail to assess adequately the impact of proposals on any heritage assets.
- 3.8. The heritage policies cover the protection of assets, both designated and undesignated, known and unknown, and the setting of those assets.
- 3.9. The policies ascribe value to all heritage assets, whether designated or undesignated. In addition, Site Allocation policies will be more prescriptive about requirements relating specifically to heritage assets identified on the sites subject to allocation.
- 3.10. In addition, to complement the policies, and provide further guidance for applicants, Appendix 6 of the Local Plan contains Guidance for Proposals Impacting Heritage Assets.

Conservation Areas

- 3.11. The Council is responsible for designating conservation areas and reviewing their boundaries periodically. The NPPF advises that care should be taken to designate new conservation areas only where its special architectural or historic interest justifies the designation. It is important that the concept of conservation is not devalued through the designation of areas that lack special interest.
- 3.12. The Council has published [Conservation Area Appraisals](#), which provide a valuable indication of heritage value in more detail. Conservation Area Appraisals have been published for the following conservation areas:
- Adelphi Road
 - Burgh Heath Road
 - Chalk Lane
 - Church Street
 - College Road
 - Downs Road Estate
 - Epsom Town Centre
 - Ewell Downs Road

- Ewell Village
- Higher Green
- The Hospital Cluster
- Lintons Lane
- Pikes Hill
- Providence Place
- Stamford Green
- Woodcote
- Worple Road

Article 4 Directions

- 3.13. Legislation allows local planning authorities to introduce Article 4 Directions to restrict the changes that owners can make to the outside of their property without first obtaining planning permission.
- 3.14. The Council has introduced Article 4 directions in eleven of the conservation areas:
- Burgh Heath Road
 - Church Street
 - College Road
 - Downs Road Estate
 - Ewell Village
 - Higher Green/Longdown Lane North
 - Lintons Lane
 - Pikes Hill
 - Stamford Green
 - The Green Ewell
 - Worple Road
- 3.15. Their purpose is to protect the special character or appearance of conservation areas. The type of changes that are restricted are those relating to the removal of boundary walls, the demolition of chimneys or the removal of windows and doors. Details of the restrictions associated are found on the [Council's website](#).

Website Guidance

- 3.16. To further assist those making applications that impact heritage Guidance on the Council's website provides advice on subjects such as trees in conservation areas, issues to be considered when purchasing a listed building and guidance to owners of listed buildings. The website also includes guidance prepared by other bodies covering specialist advice on the repair and conservation of the historic environment.

Town Centre Masterplan

- 3.17. A [masterplan for the town centre](#) that forms part of the evidence base for the Local plan has been published, which has included a historic environment and character appraisal.²

² [Epsom Town Centre Masterplan Report 2024.pdf](#)

Local List

- 3.18. EEBC has a local heritage [list of 53 assets](#).³ Local heritage lists are one way in which local heritage – buildings, monuments, sites, places, areas, historic parks and gardens or other designed landscapes – can be formally identified, as part of the wider range of designation, so that their significance can be taken into account in planning applications affecting the building or site or its setting conservation area appraisals do, however, identify buildings that make a positive contribution to the conservation areas. Sites and buildings may also be identified as having a heritage value in the course of dealing with planning applications that have implications for them or their settings.
- 3.19. Surrey County Council carried out a project to review the Epsom and Ewell Local List. It is anticipated that updates to the list will be made later in 2025 following committee approval.

Undesignated Heritage Assets

- 3.20. Undesignated heritage assets can include historic buildings, gardens and archaeological sites. Archaeology is particularly problematic because much of it is buried and there may be no visual indication of anything significant. Areas identified on the Historic Environment Record or on the Local Plan Policies Map as being of possible archaeological interest will trigger the need for investigations prior to submitting a planning application and when appropriate a condition can be attached to a permission requiring site investigations prior to a development commencing.
- 3.21. There is the potential for undesignated heritage assets to be more vulnerable to damage or loss if they have not been identified by the local authority and included within the Historic Environment Record (HER). There is still an onus on the applicant to investigate fully the Historic Environment Record and to understand the significance of the site they are dealing with and for EEBC's Development Management team to identify any significance that the applicant might have overlooked.
- 3.22. In areas where conservation area appraisals have been prepared, buildings that make a positive contribution to the conservation area are identified together with important features such as walls and open spaces. The appraisals also include historic Ordnance Survey maps and an indication of archaeological areas. These appraisals are an important resource for identifying undesignated heritage assets and can be used to defend planning decisions on appeal.

Managing Highways and the Public Realm

- 3.23. It is recognised that in the town centre conservation areas there are commercial pressures that can impact on their character and appearance. Traffic congestion and car parking, together with the infrastructure required to manage traffic, can be visually intrusive and contribute to noise and other forms of environmental pollution.
- 3.24. None of these challenges are new or unique to Epsom and Ewell and the history of Epsom and Ewell's town centres is one of change and adaptation in response to evolving

³ [Locally listed heritage assets | Epsom and Ewell Borough Council](#)

commercial and social circumstances. Maintaining the heritage of the town centre and ensuring that new development is carefully integrated into the existing urban grain and of high quality is an important part of the strategy for its future success.

- 3.25. The majority of the public realm is the responsibility of Surrey County Council as the highway authority. The character and appearance of conservation area streets, roads and squares are impacted significantly by the policies of the County Council covering diverse infrastructure such as road signage and lighting and the approach to maintenance and improvement. Both councils have a history of working closely together to achieve public realm enhancements in conservation areas. Schemes have included projects in Epsom Town Centre.

Maintaining Open Spaces

- 3.26. EEBC is responsible for the maintenance and improvement of important open spaces in several conservation areas, including Rosebery Gardens. Other land and buildings owned by the Council contributes significantly to the character of conservation areas in the borough, including a number of off-street car parks. In order to fulfil its obligations towards the objectives of conservation area management, a close working relationship exists between the conservation team in the Planning Department and other departments within the Council.
- 3.27. The principles lying behind public realm enhancements are promoted through Loca Plan Policies and guidance and will generally help to promote:
- Deployment of quality materials for surfaces and street furniture, providing an appropriate setting for surrounding buildings;
 - Reducing clutter and respecting vistas along streets to provide a more connected town or village;
 - Providing spaces that can adapt to changing circumstances and be flexible enough to adapt to different uses;
 - Providing safe and accessible spaces, meeting the needs of disabled users;
 - Producing opportunities for works of art and craft which provide interest and local character, reflect local culture and history and provide focal points within the environment.
- 3.28. EEBC is working with the Highway Authority and local communities to produce enhancements proposals for the conservation areas. There will be new opportunities for public realm enhancements in the future through initiatives, such as in Ewell Village. The challenge will be to reduce congestion and atmospheric pollution, to balance the needs of motorists, cyclists and pedestrians and to do this in a way that is respectful of the qualities that make the conservation areas worthy of designation. This will be achieved through close working between the two local authorities and the local community.
- 3.29. Initiatives that encouraged the maintenance and enhancement of commercial property within the town centre conservation areas have been successful and were backed up with the publication of design guidance on shop fronts and advertisements. This has

improved the quality of the commercial streets but measures such as grant schemes and a review of the current guidance will be reviewed if standards deteriorate.

Urgent Works and/or Repair Notices

- 3.30. EEBC has not found it necessary to use its powers to serve Urgent Works Notices or Repairs Notices to protect heritage assets at risk, but the existence of such powers do act as a means of achieving positive outcomes in cases of neglect, deliberate or otherwise. The threat to use such powers is generally sufficient to resolve issues of repair and maintenance. The approach taken by EEBC is to work positively with owners to resolve problems rather than to resort to legal measures.

Monitoring Heritage Assets

- 3.31. Monitoring the condition of heritage assets helps to identify threats resulting from neglect or inappropriate repairs and maintenance. Monitoring the condition of heritage assets is a considerable task. Historic England compiles an annual list of 'Buildings at Risk' which considers the condition of Grade I and Grade II* listed buildings, Scheduled Ancient Monuments, registered gardens and conservation areas. The most recently published information shows that Epsom Town Centre and Horton Conservation Areas are 'at risk'.

4. Other ways the Council preserves heritage

Promoting Political Awareness

- 4.1. There has always been strong support amongst elected members of EEBC for initiatives that are designed to protect and enhance of the historic environment. The Council has appointed an elected member as a Heritage Champion who reports to the Council's Licencing and Planning Policy Committee.

Arts Culture and Heritage Strategy

- 4.2. In 2023 the Council adopted an Arts Culture and Heritage Strategy 2023-2028 whose vision is:

'To grow the role of Epsom & Ewell as a centre for cultural, creative and heritage excellence both within Surrey and beyond. By 2028, the borough will be a place recognised for its vibrant cultural provision that appeals to, represents and engages with the people who live, work, visit or study within the community'.

Training

- 4.3. Training is important for professional staff and for Members of the Council. The objective of training is to keep up with new legislation and guidance produced by government and to deepen understanding of the techniques of building conservation.
- 4.4. The providers of training opportunities range from Historic England to professional institutions, notably the Institute of Historic Building Conservation (IHBC), to private providers. The IHBC publishes a journal five times a year and organises conferences and regional meetings.
- 4.5. An important body for historic environment officers in Surrey is the Surrey Conservation Officers Group (COGS), which meets regularly throughout the year. It brings together local authority officers and local officers of Historic England to discuss matters of common concern and share experiences. Historic environment officers are often the only officer of their type within a local authority and the support of a community of similar professional staff across the County is vital.
- 4.6. Training courses are also provided specifically for councillors. Member training is organised for EEBC's new and existing Councillors on planning matters on a regular basis. This will include issues relating to the conservation of the historic environment.

Heritage Literature

- 4.7. Heritage-related publications on local subjects varies from learned books, internet blogs and articles to self-guided trails and wall plaques. The literature, guides and information is well-presented and engaging. Most of the towns and villages have published histories prepared by local history societies and these are a valuable resource. Recently published books include "Secret Epsom and Ewell: A social History" by Ruth Mansergh, and "Epsom and Ewell Through time" by Jeremy Harte (who also contributed to this topic paper).

- 4.8. Heritage trails have been published by EEBC with support from local history societies. These trails are updated and republished from time to time.
- 4.9. The primary challenge with the published information on heritage subjects is to republish and update them when required and to ensure that the public have access to them. It is likely that in the future leaflets and short guides will be made available on EEBC's website rather than printed in large numbers. Associated with this are the opportunities to engage with digital technologies to provide new ways of interpreting information that is easy to update and more creative in its engagement, particularly where younger people are concerned.

Outreach and Education

- 4.10. Within the borough there are several groups and societies that further knowledge of the historic environment. There are nine local history groups or local amenity societies. In addition, there are museums and culture centres at Bourne Hall and in Nonsuch that run events for a range of ages and on a variety of subjects designed to make history interesting and engaging.

Volunteers

- 4.11. Epsom and Ewell is very well served by local groups and their role in furthering knowledge and promoting the history and culture of the area is vital. Epsom Civic Society and the Epsom & Ewell History and Archaeological Society (EEHAS) are just two examples of groups of Volunteers and enthusiasts who are integral to the effective interpretation of the historic environment and its promotion.
- 4.12. A healthy heritage strategy will depend on a good relationship between the statutory agencies, including EEBC, and the voluntary sector. Volunteers need to know that their work is appreciated and rewarded, not just by EEBC but also by the business community which benefits from the visitors drawn to an area, and by the wider community.

5. Conclusion

- 5.1. Epsom and Ewell has a rich history, signified by a broad range of heritage assets. This paper demonstrates how the heritage of Borough has been understood and evaluated during the plan making process, both holistically and through the Heritage Impact Assessments (HIA's) in Appendix 1.
- 5.2. It shows how it can preserve and maximise heritage through the Local Plan objectives and policies, as well as further guidance. It has further evaluated how else the Council will preserve the historic environment over the plan period and demonstrates a positive strategy for the conservation and enjoyment of the historic environment.

Appendix 1: Heritage Impact Assessments of Site Allocations

The following impact assessments have been carried out in accordance with Historic England Advice Note 3 “[The Historic Environment and Site Allocations in Local Plans](#)”. It follows a proportionate approach, for allocation purposes, to the step-by-step process outlined on page 5 of that document.

SA1, SA2, SA3: Hook Road Car Park, Solis House & Southern Gas Network Site

STEP 1: Identification of heritage assets

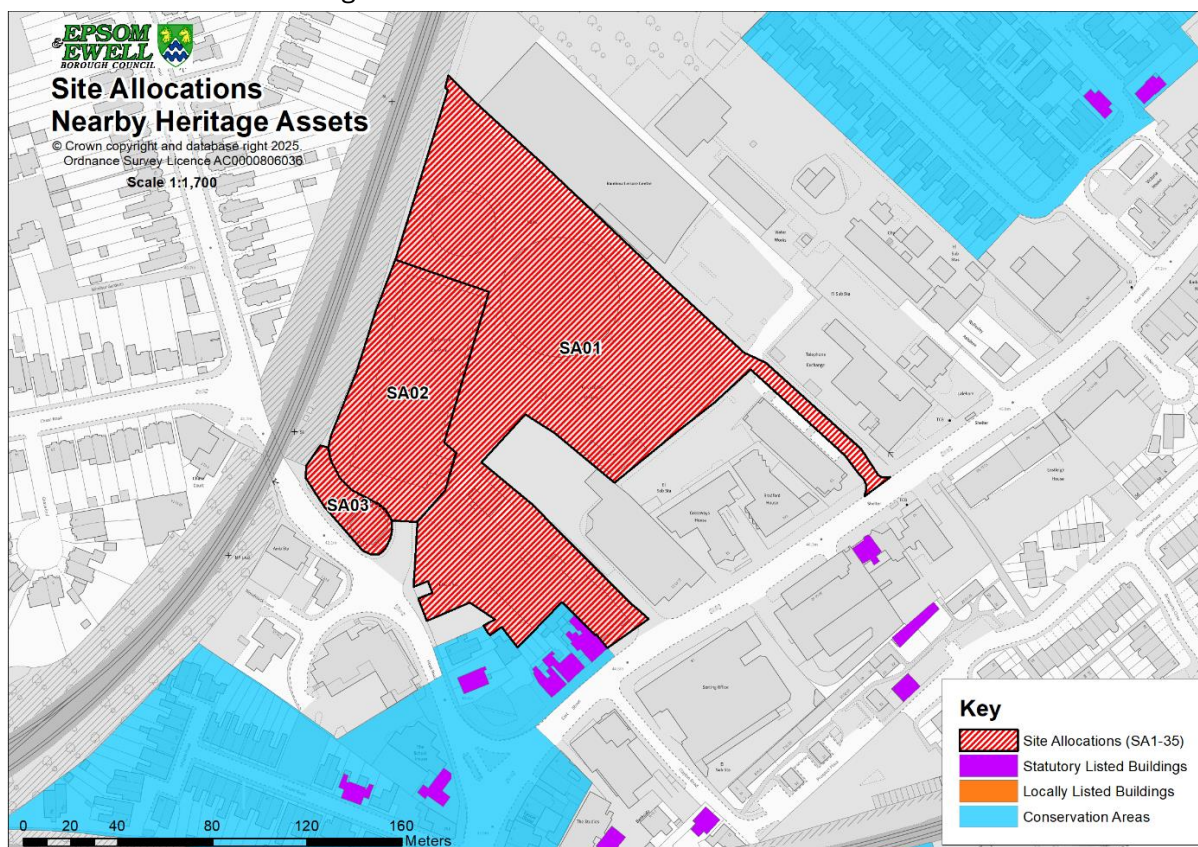
A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby this group of sites. The following assets have been identified:

Conservation areas

- Adelphi Road Conservation Area
- Lintons Lane Conservation Area

Statutory listed buildings

- Grade II Listed Buildings:
 - 10 & 12 Hook Road
 - 23-25 East Street
 - The Plough and Harrow Public House
 - 3 and 5 Adelphi Road
 - 23 and 24 Prospect Place
 - 1 and 3 Lintons Lane
 - Flint Cottage
 - 19 & 21 East Street
 - Hook Road School
 - 31 Prospect Place, Epsom
 - 42-44 East Street
 - 10 and 12 Lintons Lane
 - 6-8 Clinton Road



STEP 2: Contribution of the site to the significance of the heritage assets

Each of these heritage assets is significant in their own right, as described in their respective Conservation Area Appraisal or list description. However, the sites themselves, being predominantly utilitarian in character lack an obvious connection to these characteristics, with the exception of the gasholders, which appear to have existed since at least 1913, although they have changed over time.

STEP 3: Impact of allocation on significance

The quantum and scale indicated by the allocation policy shows that the characteristics of the site will change significantly. However, transitioning from a utilitarian to residential or mixed-use character has the potential to enhance the significance of surrounding heritage assets rather than cause harm.

The cluster of sites has been considered through the Epsom Town Centre Masterplan which includes a townscape analysis to address this issue. A Heritage Impact Assessment and Townscape Analysis, including views from conservation areas, should be required with any application.

STEP 4: Enhancements

As part of any development on this site, opportunities to enhance heritage assets should be sought. Potential enhancements could include helping to enhance the relationship between conservation areas by improving routes and wayfinding. Consideration should also be given to respecting the nature of the existing gasholders, which speak to a time when the town functioned differently from a utilities perspective.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA4: Bunzl, Hook Road

STEP 1: Identification of heritage assets

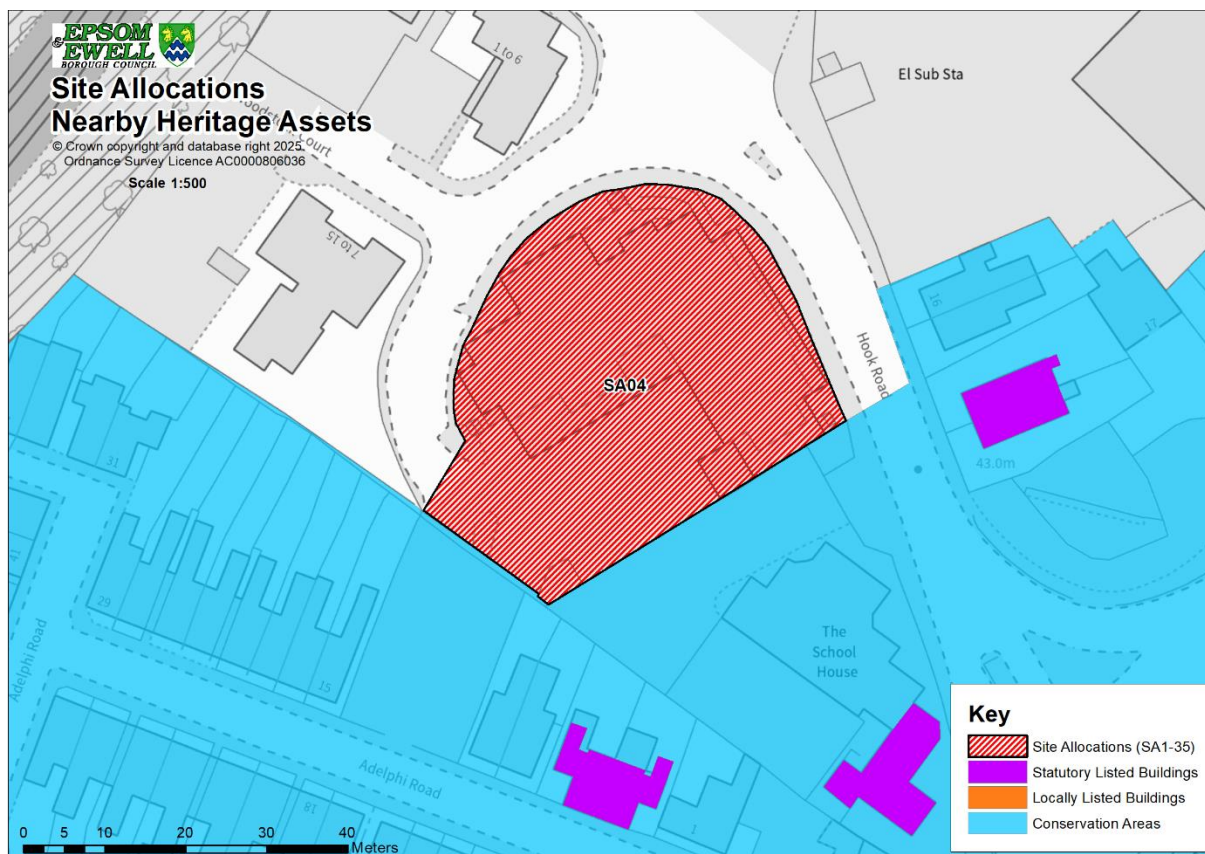
A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Conservation areas:

- Adelphi Road Conservation Area.

Statutory listed buildings:

- Grade II Listed Buildings:
 - 10 and 12 Hook Road
 - 3 and 5 Adelphi Road
 - Hook Road School



STEP 2: Contribution of the site to the significance of the heritage assets

Each of these heritage assets is significant in their own right, as described in their respective Conservation Area Appraisal or list description. However, the site itself, being predominantly a modern utilitarian office building lacks an obvious connection to these characteristics.

STEP 3: Impact of allocation on significance

The quantum and scale indicated by the allocation policy indicates that the characteristics of the site will not change that significantly. However, transitioning from a utilitarian to residential

character has the potential to enhance the significance of surrounding heritage assets rather than cause harm.

STEP 4: Enhancements

There are no obvious enhancements to be gained to the identified heritage assets.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA5 Epsom Town Hall

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Conservation areas:

- Church Street Conservation Area
- Epsom Town Centre Conservation Area

Statutory listed buildings:

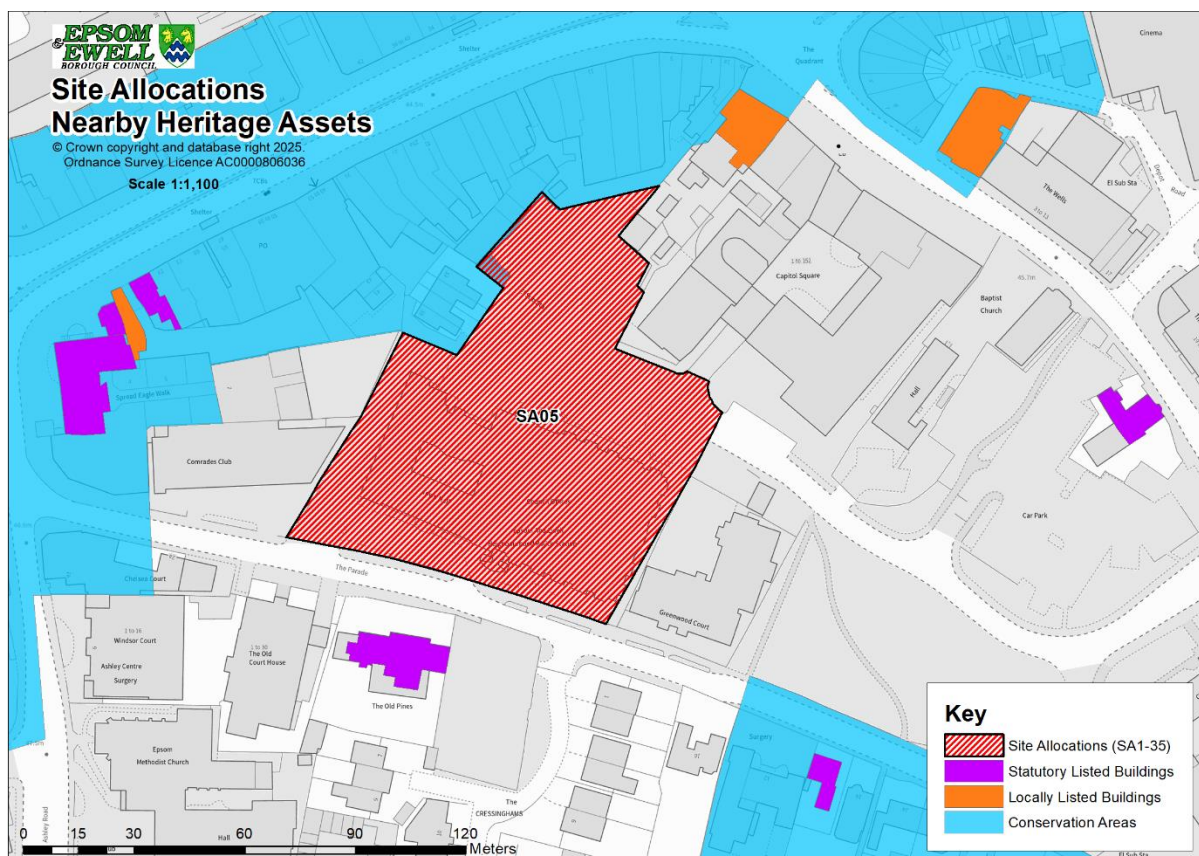
- Grade II Listed Buildings:
 - The Old Pines
 - Rosebery Cottage
 - Hope Lodge
 - 75-77 High Street
 - Spread Eagle Hotel and No. 89 High Street

Locally listed buildings:

- 87 High Street
- 1 Church Street
- The Vestry

Other heritage assets:

- Historic Town Core Archaeological site,



STEP 2: Contribution of the site to the significance of the heritage assets

Each of these heritage assets is significant in their own right, as described in their respective Conservation Area Appraisal or list description.

The northern part of the site consists of an area of surface level public car parking accessed from Dullshot Green. The car park is partially bordered by the rear elevations and service areas of buildings located within the Epsom Town Centre Conservation Area and beyond the conservation area a modern block of apartments.

The Town Hall building which is located on the southern part of the site consists of the 'old' town hall which was constructed in the 1930's and an extension that was added (the eastern wing) in the 1990's. The two buildings are connected by an Atrium. The old town hall contributes to the character of the surrounding area.

Directly opposite the Town Hall building is the Grade II listed building 'Old Pines' which contributes to the streetscape of The Parade, although there are numerous modern developments that have been constructed in the surrounding area located between the two conservations areas.

The Town Hall could be considered to be a civic focal point for the town centre, having a cultural heritage quality to it. Whilst it is not in a prominent location it is character-defining, being a place which may be recognised as a place where important decisions about the borough are made by elected representatives.

The surrounding conservation areas are intrinsically "of Epsom". The Town centre is one of the main contributors to the character of Epsom as described in more detail in this Heritage Topic Paper and Conservation area appraisal.

STEP 3: Impact of allocation on significance

For allocation purposes there are few known details about any future scheme in the draft proposed allocation policy, aside from quantum of development. However, the Epsom Town Centre Masterplan for the town centre contains some indicative plans, which shows built form sympathetic to the scale and character of the surrounding area. Whilst this shows how sensitive future development could be.

As noted above the town hall buildings form part of the site which consists of the old town hall and a more modern extension. The development of the site could impact on the character of The Parade and the setting of the Grade II Listed Old Pines will need to be considered through the design of any future development.

The site has been considered through the Epsom Town Centre Masterplan which includes a townscape analysis to address this issue.

It is considered that the site makes a limited contribution to the setting of both the Church Street and Epsom Town Centre Conservation Areas.

STEP 4: Enhancements

Development of the site brings with it opportunities for enhancement.

Improving legibility between the site and conservation areas beyond the site boundary could also be an opportunity including enhancements to public realm.

There is opportunity through development of the site to recognise the role the Town Hall has played in the civic story of the borough. A comprehensive Heritage Statement to accompany any forthcoming planning application should address this.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on these sites is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

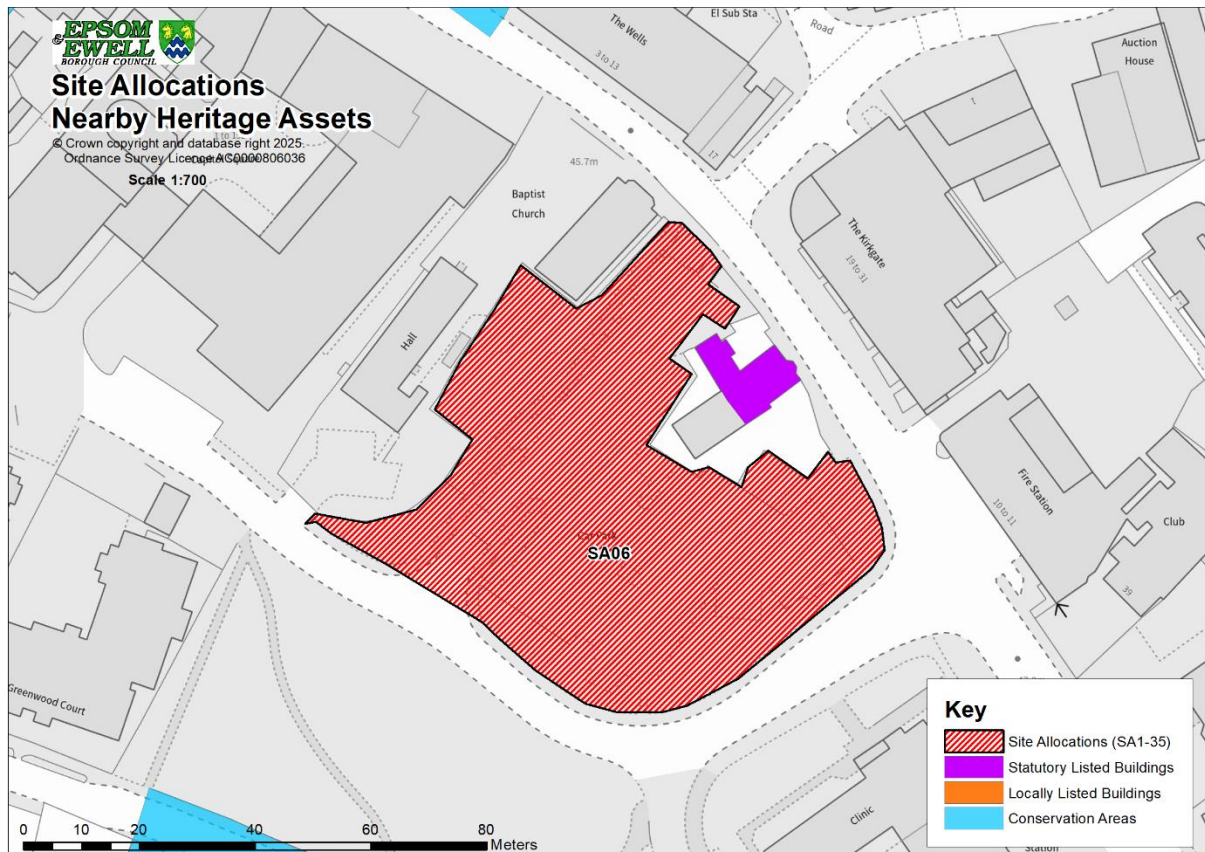
SA6: Hope Lodge Car Park

STEP 1 – Identification of Heritage Assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Statutory listed buildings:

- Grade II Listed Buildings:
 - Hope Lodge



STEP 2: Contribution of the site to the significance of the heritage assets

The existing use of the site as a surface level car park does little to contribute to these Assts

STEP 3: Impact of allocation on significance

For allocation purposes there are few known details about any future scheme in the draft proposed allocation policy, aside from quantum of development. However, the Epsom Town Centre Masterplan contains some indicative plans, which shows built form sympathetic to the scale and character of the surrounding area.

The introduction of buildings on the car park will impact on the setting of Hope Lodge, although this could be mitigated through sensitive design.

The site has been considered through the Epsom Town Centre Masterplan which includes a townscape analysis to address this issue.

STEP 4: Enhancements

Development brings with it opportunities for enhancement. One major opportunity is the enhancement of Dulshott Green, to the south west of the site allocation, into a much more utilised civic space. Improving overlooking into public spaces can also enhance natural surveillance and create a much more welcoming atmosphere.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on these sites is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA7 Former Police and Ambulance Station sites

STEP 1 – Identification of Heritage Assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Conservation areas:

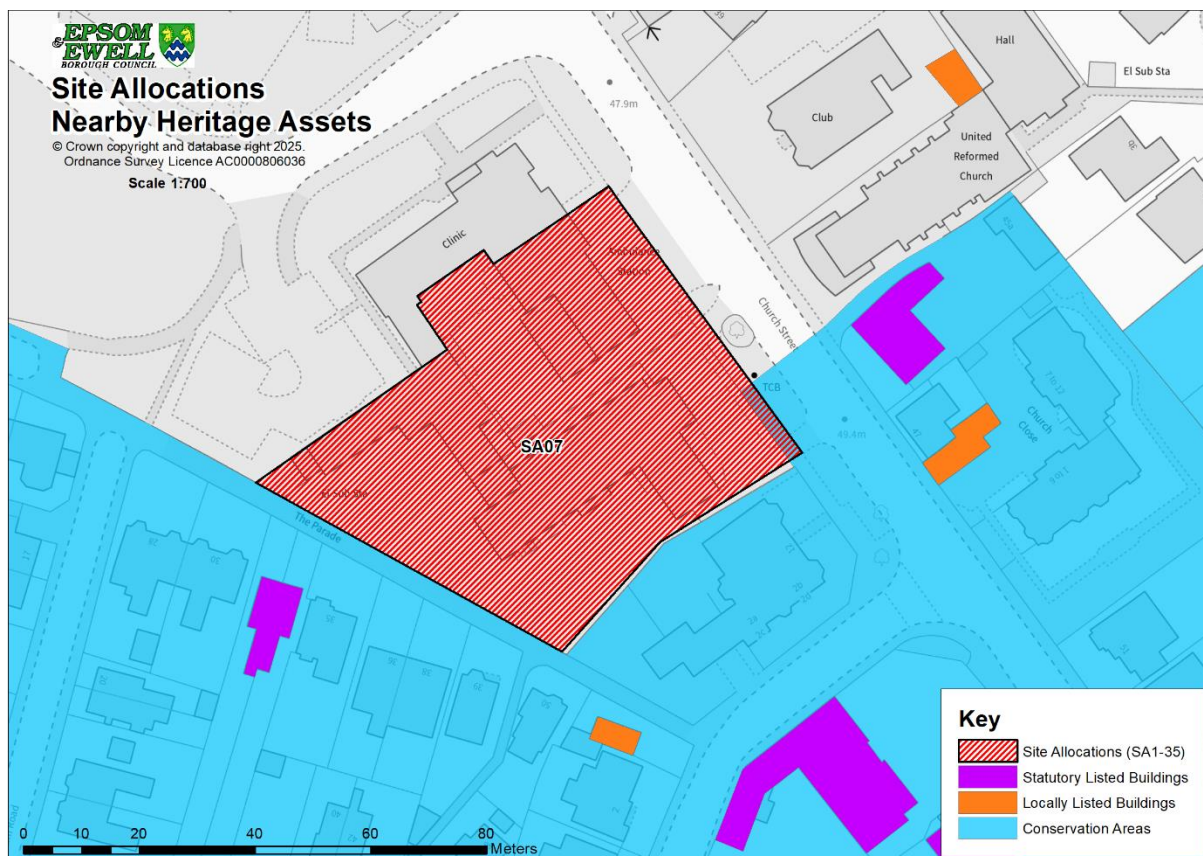
- Church Street Conservation Area

Statutory listed buildings:

- Grade II* Listed Buildings
 - The Cedars
- Grade II Listed Buildings:
 - The Hermitage
 - Ashley Cottages
 - Hope Lodge

Locally listed buildings:

- Coach House
- 52 The Parade



STEP 2: Contribution of the site to the significance of the heritage assets

The existing buildings on site are of utilitarian design and do little to contribute to the surrounding heritage assets.

STEP 3: Impact of allocation on significance

A planning application for development of this site was approved under 22/00923/FUL. The planning application was for the demolition of the existing police station (Use Class E) and ambulance station (Sui Generis) and erection of a new residential, nursing and dementia care home for the frail elderly (Use Class C2) comprising ancillary communal facilities and dementia care, basement parking, reconfigured vehicular access onto Church Street, landscaping and all other associated works.

The report for that application stated that the development would cause less than substantial harm to heritage assets.

STEP 4: Enhancements

Development brings with it opportunities for enhancement of the streetscape along Church Street which could enhance the setting of the Church Street conservation area that adjoins the southern site boundary.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on these sites is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA8 Epsom Clinic

STEP 1 – Identification of Heritage Assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Conservation areas:

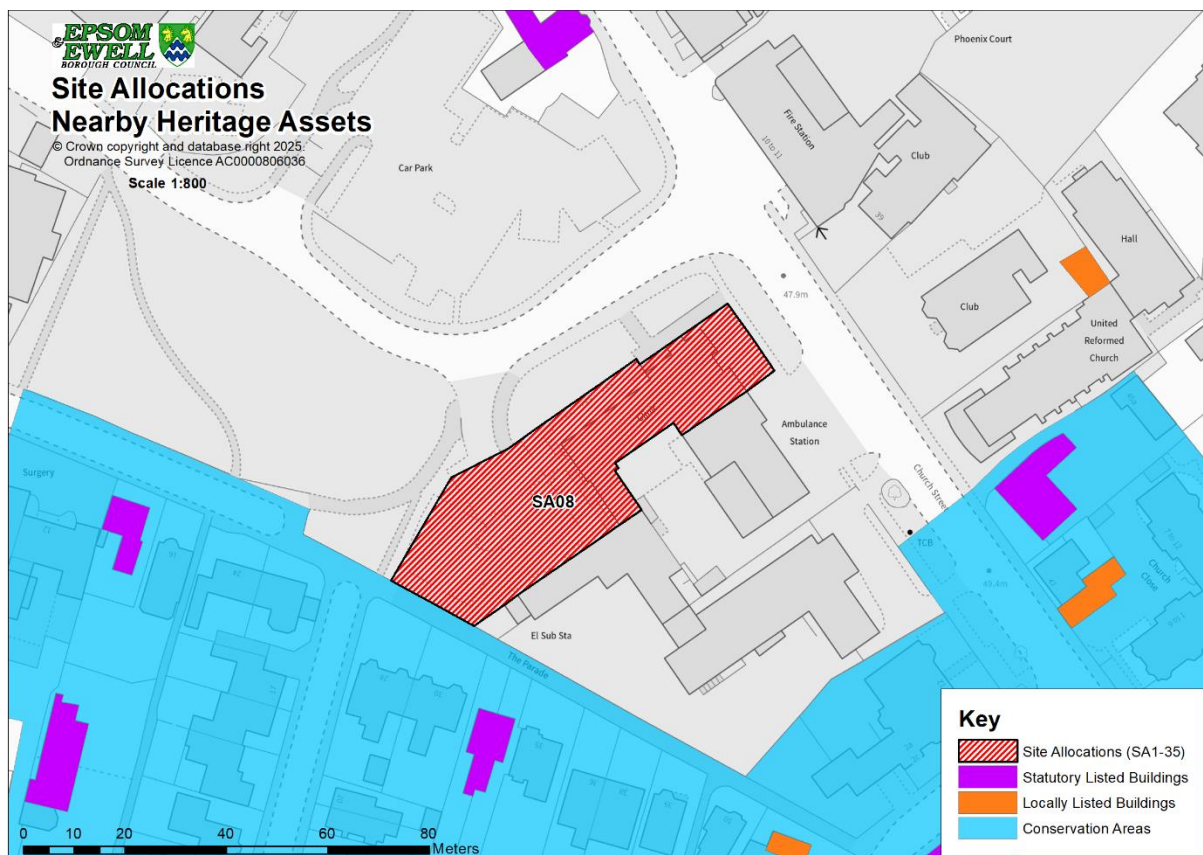
- Church Street Conservation Area

Statutory listed buildings:

- Grade II* Listed Buildings
 - The Cedars
- Grade II Listed Buildings:
 - The Hermitage
 - Ashley Cottages
 - Hope Lodge
 - Rosebery Cottage

Locally listed buildings:

- Coach House
- 52 The Parade



STEP 2: Contribution of the site to the significance of the heritage assets

The buildings are of utilitarian design and do little to contribute to the surrounding heritage assets.

STEP 3: Impact of allocation on significance

The site has been considered through the Epsom Town Centre Masterplan which includes a townscape analysis to address this issue.

A planning application for development of the site adjacent was approved under 22/00923/FUL. The planning application was for the demolition of the existing police station (Use Class E) and ambulance station (Sui Generis) and erection of a new residential, nursing and dementia care home for the frail elderly (Use Class C2) comprising ancillary communal facilities and dementia care, basement parking, reconfigured vehicular access onto Church Street, landscaping and all other associated works.

The report for that application stated that the development would cause less than substantial harm to heritage assets. It is therefore likely that the development of this adjoining site will cause less than substantial harm to the heritage assets including the Church Street Conservation Area that is located to the south of the site.

STEP 4: Enhancements

Development brings with it opportunities for enhancement. One major opportunity is the enhancement of Dulshott Green, to the north west of the site allocation, into a much more utilised civic space. Improving overlooking into public spaces can also enhance natural surveillance and create a much more welcoming atmosphere.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on these sites is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA9: Depot Road and Upper High Street

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Conservation areas:

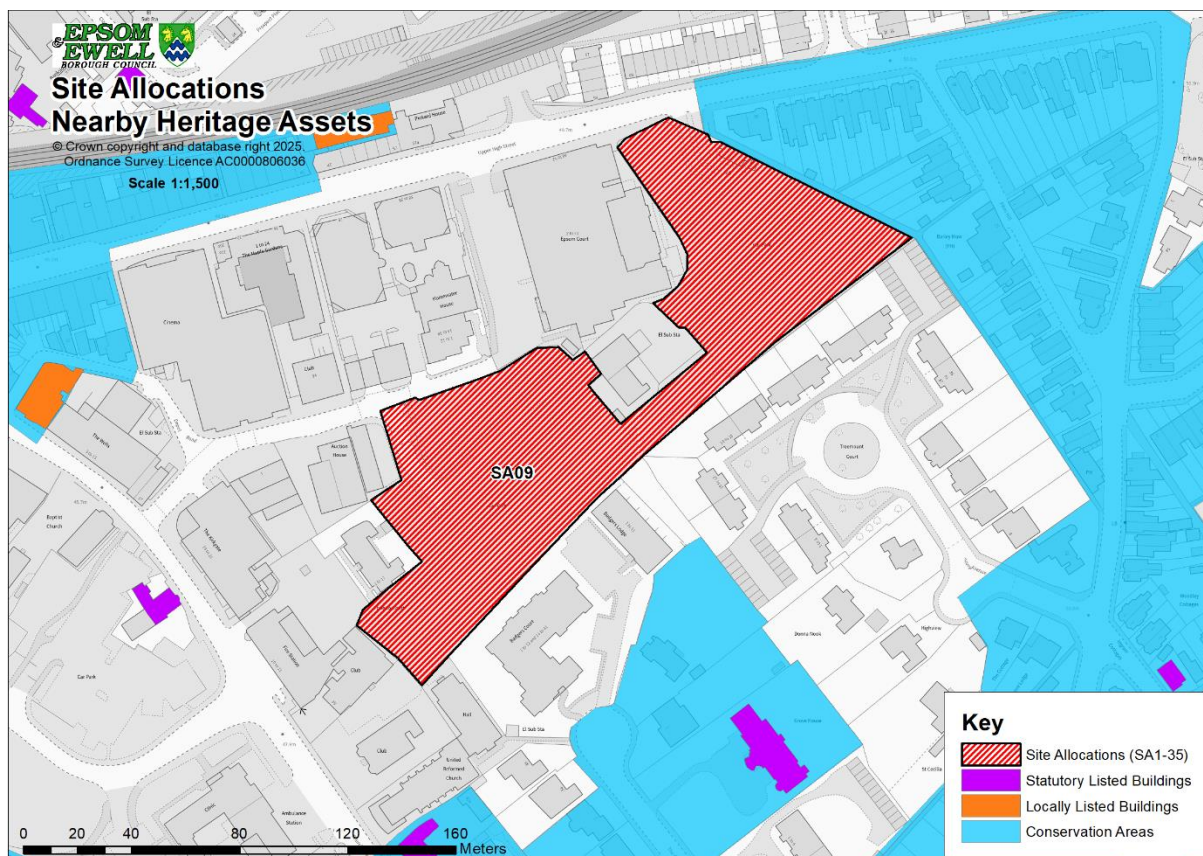
- Epsom Town Centre Conservation Area
- Pikes Hill Conservation Area
- Church Street Conservation Area

Statutory listed buildings:

- Grade II Listed Buildings:
 - Grove House
 - The Hermitage
 - Hope Lodge

Other heritage assets

- Area of Archaeological Potential



STEP 2: Contribution of the site to the significance of the heritage assets

Each of these heritage assets is significant in their own right, as described in their respective Conservation Area Appraisal or list description. However, the site itself, being predominantly a utilitarian surface level car park lacks an obvious connection to these characteristics.

STEP 3: Impact of allocation on significance

The quantum and scale indicated by the allocation policy indicates that the characteristics of the site will not change that significantly, with part of the site retained for decked car parking. The height of such a car park will need to be considered when viewed from the surrounding conservation areas, as will any residential building exceeding the height of surrounding buildings which currently enclose the site. However, transitioning from a utilitarian to residential or mixed use character has the potential to enhance the significance of surrounding heritage assets rather than cause harm.

The site has been considered through the Epsom Town Centre Masterplan which includes a townscape analysis to address this issue. A Heritage Impact Assessment and Townscape Analysis, including views from conservation areas, should be required with any application.

STEP 4: Enhancements

As part of any development on this site, enhancements to heritage assets should be sought. Potential enhancements could include helping to enhance the relationship between conservation areas by improving routes and wayfinding.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA10: 79-85 East Street

STEP 1: Identification of heritage assets

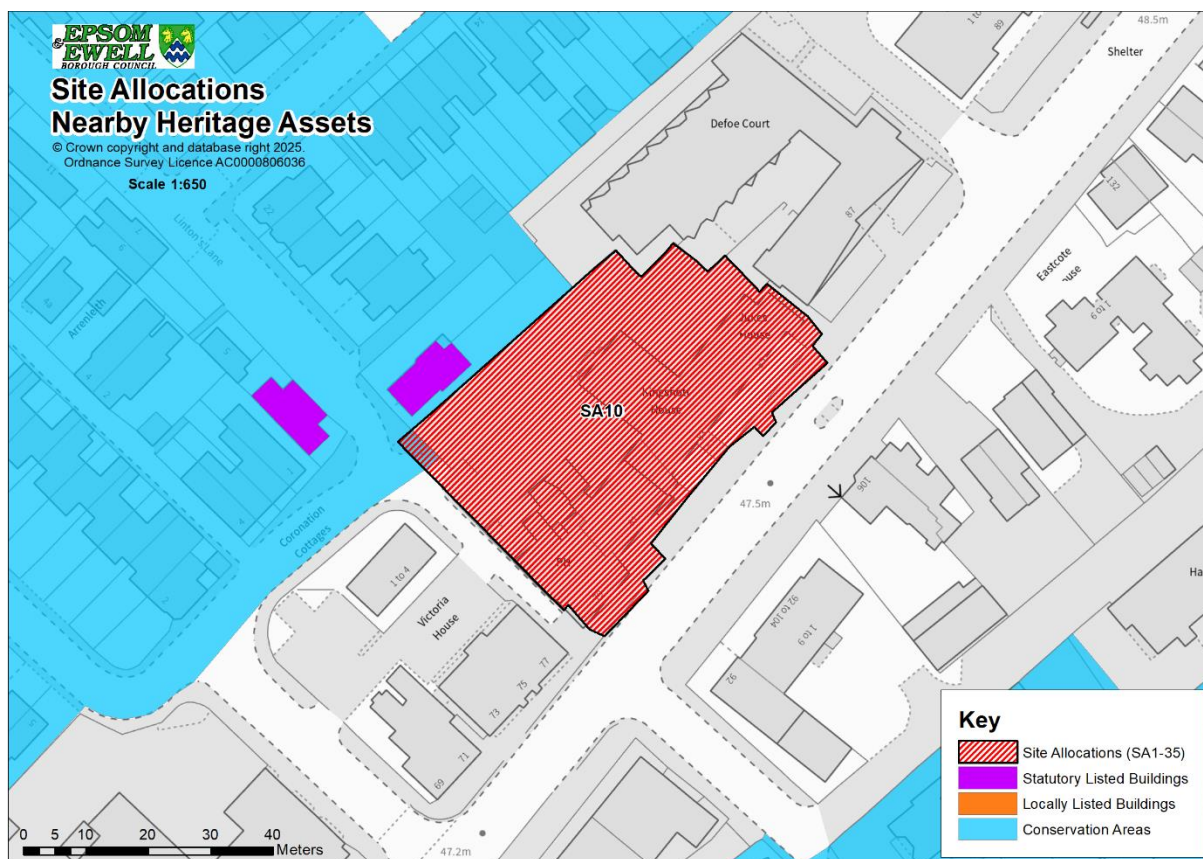
A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Conservation areas:

- Lintons Lane Conservation Area
- Providence Place Conservation Area

Statutory listed buildings:

- Grade II Listed Buildings:
 - 1 and 3 Lintons Lane
 - 10 and 12 Lintons Lane



STEP 2: Contribution of the site to the significance of the heritage assets

Each of these heritage assets is significant in their own right, as described in their respective Conservation Area Appraisal or list description. However, the site itself, being a utilitarian office and former public house, lacks an obvious connection to these characteristics.

STEP 3: Impact of allocation on significance

The quantum and scale indicated by the allocation policy indicates that the characteristics of the site will not change that significantly. However, transitioning from a utilitarian to more

residential character has the potential to enhance the significance of surrounding heritage assets rather than cause harm.

STEP 4: Enhancements

There are no obvious enhancements to be gained to the identified heritage assets. Potential enhancements could include helping to enhance the relationship between conservation areas by improving routes and wayfinding.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA11: Finachem House 2-4 Ashley Road

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Conservation areas:

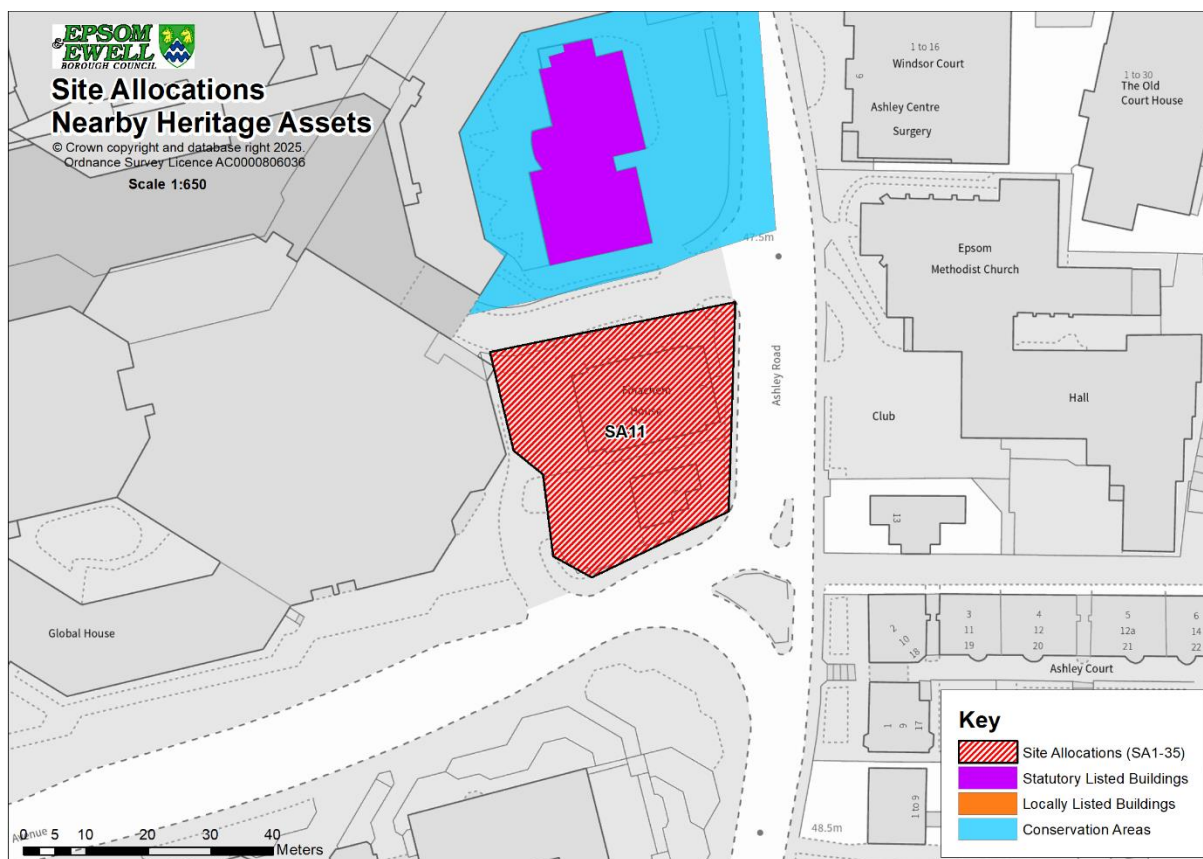
- Epsom Town Conservation Area

Statutory listed buildings:

- Grade II Listed Buildings:
 - Ashley House

Other heritage assets

- Epsom Historic Town Core Area of Archaeological Potential



STEP 2: Contribution of the site to the significance of the heritage assets

Each of these heritage assets is significant in their own right, as described in their respective Conservation Area Appraisal or list description. The southern building has a more traditional 1930s character than the northern one, which itself is a more modern office block that incorporates some interesting details such as a mansard roof and verticality in its fenestration.

STEP 3: Impact of allocation on significance

The quantum and scale indicated by the allocation policy indicates that the characteristics of the site could change quite significantly. However, the impact over and above the existing building is unlikely to enhance the conservation area. Development of the site could impact on the setting of the Grade II Listed Ashley House which will need to be considered through the design of any future development.

The site has been considered through the Epsom Town Centre Masterplan which includes a townscape analysis to address this issue. Whilst careful consideration will need to be given, a Heritage Impact Assessment and Townscape Analysis, including views from conservation areas, should be required with any application.

STEP 4: Enhancements

There are no obvious enhancements to be gained to the identified heritage assets. However, there may be potential to enhance the setting of the Ashley House Listed Building.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA12: Global House

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Conservation areas:

- Epsom Town Centre Conservation Area

Statutory listed buildings:

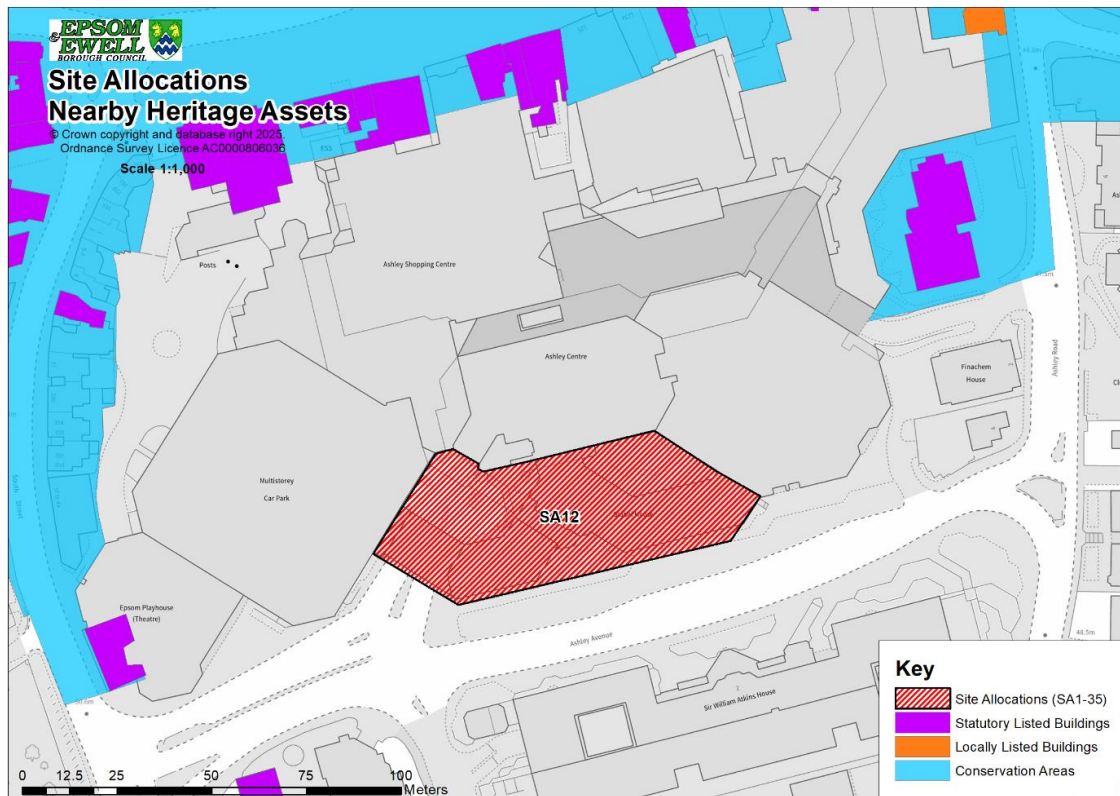
- Grade II* Listed Buildings
 - Ashley House
 - 127 – 129 High Street
- Grade II Listed Buildings:
 - 47-51 South Street (Epsom Playhouse)
 - 29 South Street
 - 55 South Street
 - 107 High Street
 - 119 and 121 High Street
 - 131 High Street
 - 137a – 139 High Street
 - 141 High Street
 - 149 – 153 High Street
 - 131 High Street

Locally listed buildings:

- 93, 95 and 95a High Street

Other heritage assets:

- Area of High Archaeological Potential



STEP 2: Contribution of the site to the significance of the heritage assets

Each of these heritage assets is significant in their own right, as described in their respective Conservation Area Appraisal or list description. The Ashley Centre and Global House are not heritage assets, but examples of 1970s/80s modernist development. Although they make little contribution to the historic fabric of the town centre, its contrast with some of the more traditional buildings gives it an air of interesting incongruity and a symbol of the evolving nature of commerce, crucial to the vitality of the town centre.

STEP 3: Impact of allocation on significance

The quantum and scale indicated by the allocation policy indicates that the characteristics of the site will change. Increases in height will impact views in and out of the conservation area and have a degree of impact on the setting of the surrounding listed buildings. The Epsom Town Centre Masterplan includes a townscape analysis to address this issue. Whilst careful consideration will need to be given, a Heritage Impact Assessment and Townscape Analysis, including views from conservation areas, should be required with any application.

STEP 4: Enhancements

As part of any development on this site, enhancements to heritage assets should be sought.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA13: Swail House

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Conservation areas:

- Church Street Conservation Area

Statutory listed buildings:

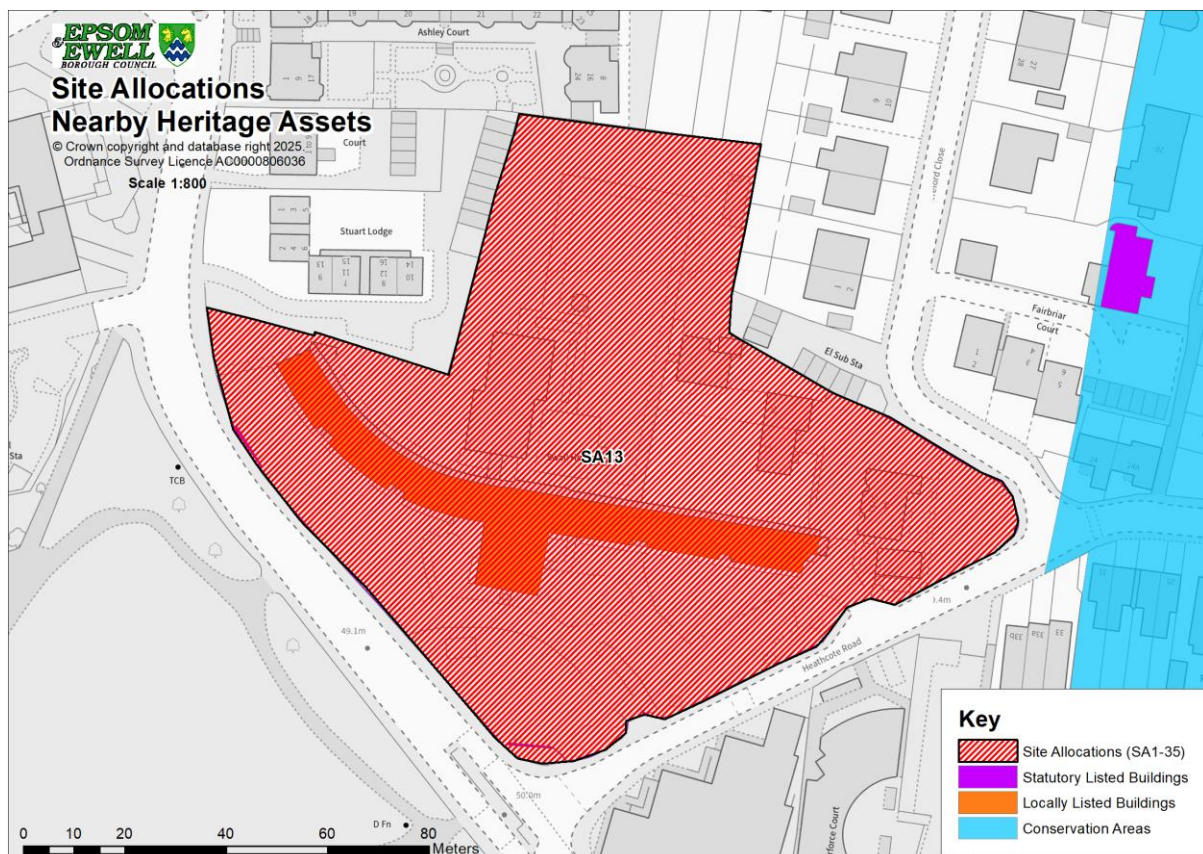
- Grade II Listed Buildings:
 - Melrose Cottage
 - Garden Wall to Swail House

Locally listed buildings:

- Swail House

Other heritage assets:

- Rosebery Park



STEP 2: Contribution of the site to the significance of the heritage assets

Swail House is a Locally Listed Building. There are broadly two components to the building – an older component in the centre (formally Worple Lodge) and the more modern “J” shaped

building to the rear, was built in 1952. The current building is described as world's first purpose built home for the blind. Both are, in and of themselves significant to the tangible and cultural heritage of the borough.

STEP 3: Impact of allocation on significance

The quantum and scale indicated by the allocation policy indicates that the characteristics of the site will change quite significantly. Of additional note is the large garden area to the rear, proportionate to the scale of the building. Replacement dwellings, if built here, will alter the character of the plot significantly. However, this impact may be less obvious at ground level when viewed from public highway. The original design of the building had been carefully considered following the contours and layout of the plot, and so any alteration to it and its setting should be considered carefully in this context.

STEP 4: Enhancements

There are opportunities for enhancements to the whole site, but particularly the details of Swail House. Consideration to retaining or re-instating original features of Swail House is an example of where enhancements could be made from the proceeds of additional development. Consideration should also be given to the cultural significance of the building's use, celebrating its contribution to and raising awareness of the blind community.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA14: 60 East Street

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. No Heritage Assets have been identified.

STEP 2: Contribution of the site to the significance of the heritage assets

As no heritage assets have been identified, the site's contribution is considered minimal.

STEP 3: Impact of allocation on significance

As no heritage assets have been identified, the impact of allocation is considered minimal.

STEP 4: Enhancements

As no heritage assets have been identified, there are no known opportunities for enhancement of heritage assets.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA15: Corner of Kiln Lane and East Street (101b East Street)

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. No Heritage Assets have been identified.

STEP 2: Contribution of the site to the significance of the heritage assets

As no heritage assets have been identified, the site's contribution is considered minimal.

STEP 3: Impact of allocation on significance

As no heritage assets have been identified, the impact of allocation is considered minimal.

STEP 4: Enhancements

As no heritage assets have been identified, there are no known opportunities for enhancement of heritage assets.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA16: Land at Kiln Lane

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. No Heritage Assets have been identified.

STEP 2: Contribution of the site to the significance of the heritage assets

As no heritage assets have been identified, the site's contribution is considered minimal.

STEP 3: Impact of allocation on significance

As no heritage assets have been identified, the impact of allocation is considered minimal.

STEP 4: Enhancements

As no heritage assets have been identified, there are no known opportunities for enhancement of heritage assets.

STEP 5: Appropriateness in light of NPPF soundness tests

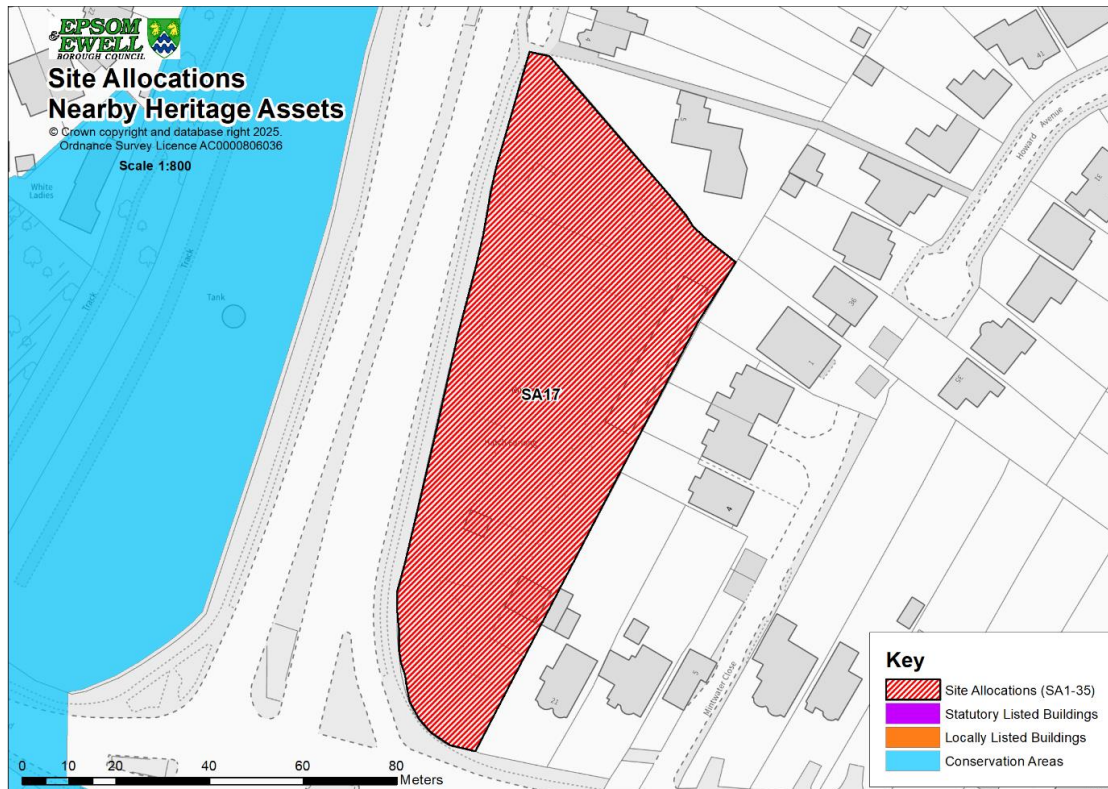
The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA17: Hatch Furlong Nursery

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

- Ewell Village Conservation Area



STEP 2: Contribution of the site to the significance of the heritage assets

The site is severed from the conservation area by the Ewell Bypass and makes little contribution to the Conservation Area.

STEP 3: Impact of allocation on significance

The impact of allocation will depend on the resulting built form. Tall buildings may be visible from the Conservation Area, but at the density suggested in the allocation policy.

STEP 4: Enhancements

There is arguably an opportunity to slightly enhance conservation area by creating a sense of connection to it by introducing habitable dwellings closer to it.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA18: Land to the Rear of Rowe Hall

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. No Heritage Assets have been identified.

STEP 2: Contribution of the site to the significance of the heritage assets

As no heritage assets have been identified, the site's contribution is considered minimal.

STEP 3: Impact of allocation on significance

As no heritage assets have been identified, the impact of allocation is considered minimal.

STEP 4: Enhancements

As no heritage assets have been identified, there are no known opportunities for enhancement of heritage assets.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA19: 7 Station Approach

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. No Heritage Assets have been identified.

STEP 2: Contribution of the site to the significance of the heritage assets

As no heritage assets have been identified, the site's contribution is considered minimal.

STEP 3: Impact of allocation on significance

As no heritage assets have been identified, the impact of allocation is considered minimal.

STEP 4: Enhancements

As no heritage assets have been identified, there are no known opportunities for enhancement of heritage assets.

STEP 5: Appropriateness in light of NPPF soundness tests

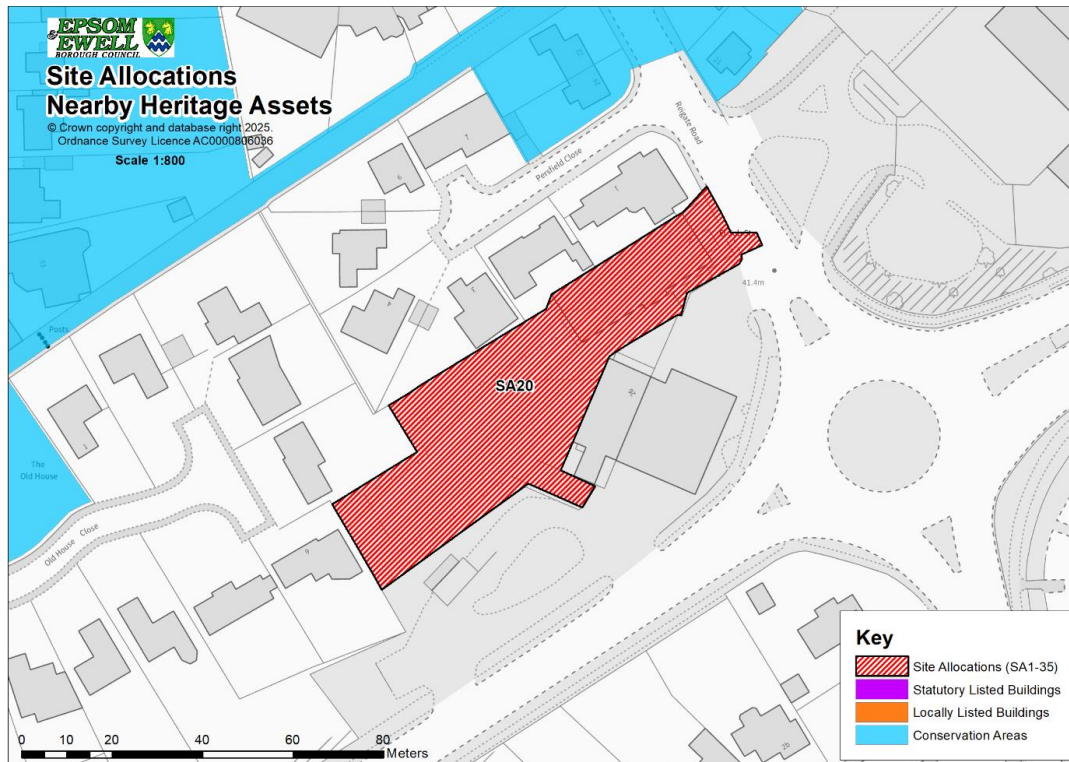
The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA20: Esso Express, 26 Reigate Road

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

- Ewell Village Conservation Area



STEP 2: Contribution of the site to the significance of the heritage assets

The site makes little contribution to the Conservation Area.

STEP 3: Impact of allocation on significance

The impact of allocation will depend on the resulting built form. Tall buildings may be visible from the Conservation Area, but at the density suggested in the allocation policy it will cause no more harm than other commercial buildings nearby.

STEP 4: Enhancements

There is arguably an opportunity to slightly enhance conservation area by creating a sense of connection to it by introducing habitable dwellings closer to it.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA21: Richards Field Car Park

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. No Heritage Assets have been identified.

STEP 2: Contribution of the site to the significance of the heritage assets

As no heritage assets have been identified, the sites contribution is considered minimal.

STEP 3: Impact of allocation on significance

As no heritage assets have been identified, the impact of allocation is considered minimal.

STEP 4: Enhancements

As no heritage assets have been identified, there are no known opportunities for enhancement of heritage assets.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA22: Etwelle House, Station Road

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. No Heritage Assets have been identified.

STEP 2: Contribution of the site to the significance of the heritage assets

As no heritage assets have been identified, the site's contribution is considered minimal.

STEP 3: Impact of allocation on significance

As no heritage assets have been identified, the impact of allocation is considered minimal.

STEP 4: Enhancements

As no heritage assets have been identified, there are no known opportunities for enhancement of heritage assets.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA23: 140-142 Ruxley Lane

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. No Heritage Assets have been identified.

STEP 2: Contribution of the site to the significance of the heritage assets

As no heritage assets have been identified, the site's contribution is considered minimal.

STEP 3: Impact of allocation on significance

As no heritage assets have been identified, the impact of allocation is considered minimal.

STEP 4: Enhancements

As no heritage assets have been identified, there are no known opportunities for enhancement of heritage assets.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA24: Garages at Somerset Close & Westmoland Close

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. No Heritage Assets have been identified.

STEP 2: Contribution of the site to the significance of the heritage assets

As no heritage assets have been identified, the site's contribution is considered minimal.

STEP 3: Impact of allocation on significance

As no heritage assets have been identified, the impact of allocation is considered minimal.

STEP 4: Enhancements

As no heritage assets have been identified, there are no known opportunities for enhancement of heritage assets.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA25: 64 South Street Epsom

STEP 1: Identification of heritage assets

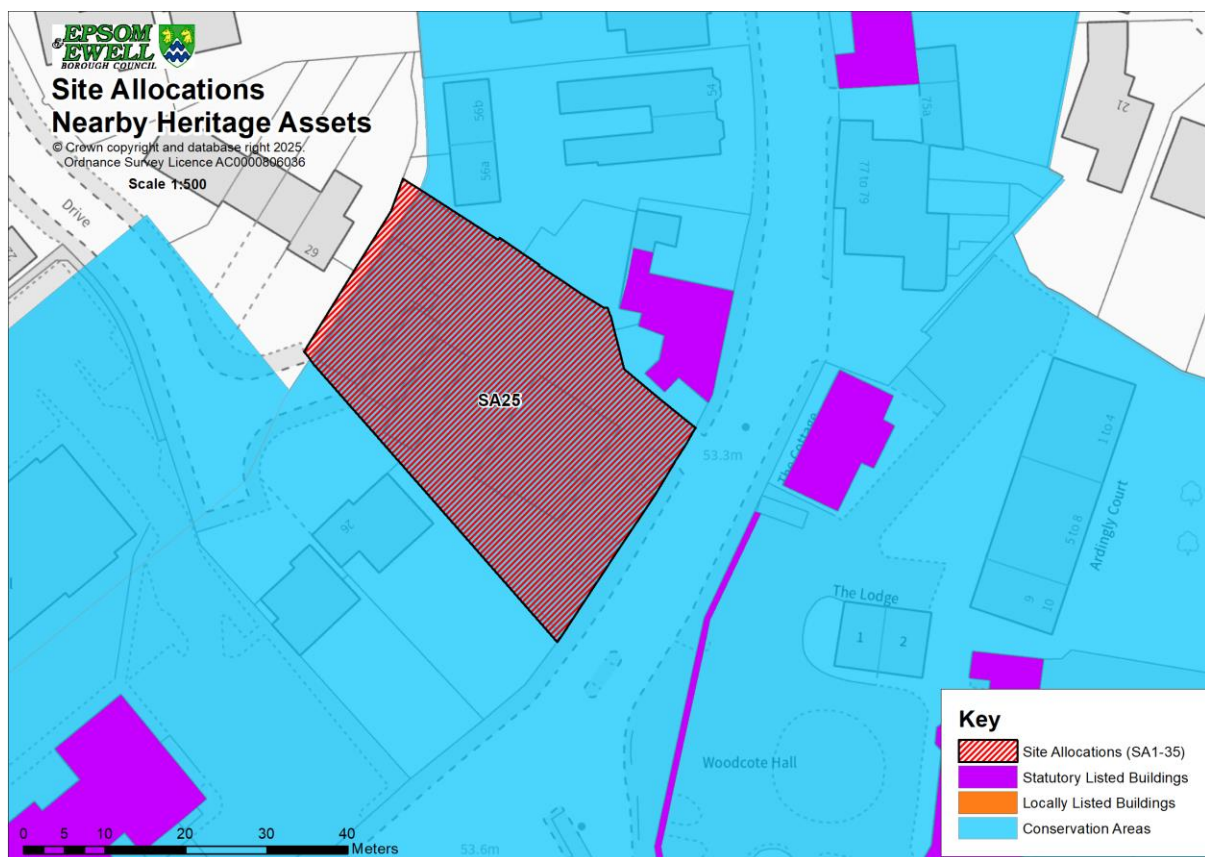
A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Conservation Area

- Woodcote Conservation Area

Statutory Listed Buildings:

- Grade II Listed Buildings:
 - Woodcote Hall
 - Abell Cottages
 - The Cottage



STEP 2: Contribution of the site to the significance of the heritage assets

The site is nestled amongst a cluster of heritage assets but itself is of utilitarian design, screened from the road by high blank wall and signage. It does little to contribute to the character of the heritage assets.

STEP 3: Impact of allocation on significance

The impact of allocation will depend on the resulting built form. It is unlikely to have a detrimental impact.

STEP 4: Enhancements

There is arguably an opportunity to slightly enhance conservation area by removing the boundary wall and making dwellings face the street. Front gardens/amenity space may be one way to do this.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA26: 35 Alexandra Road

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. No Heritage Assets have been identified.

STEP 2: Contribution of the site to the significance of the heritage assets

As no heritage assets have been identified, the site's contribution is considered minimal.

STEP 3: Impact of allocation on significance

As no heritage assets have been identified, the impact of allocation is considered minimal.

STEP 4: Enhancements

As no heritage assets have been identified, there are no known opportunities for enhancement of heritage assets.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

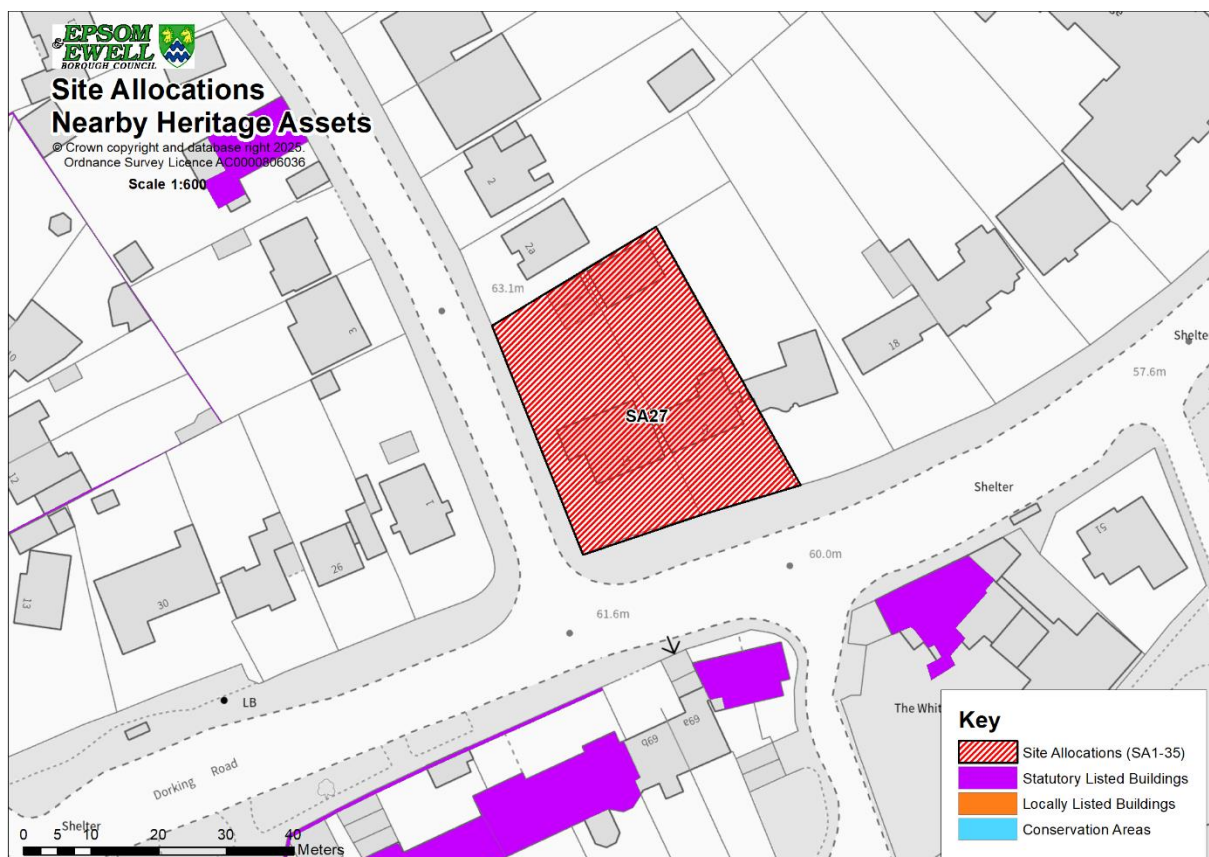
SA27: 22-24 Dorking Road

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following heritage assets have been identified:

Statutory Listed Buildings:

- Grade II* Listed Buildings:
 - The Hylands
- Grade II Listed Buildings
 - 67 and 69 Dorking Road
 - New Inn
 - Tamarisk Cottage



STEP 2: Contribution of the site to the significance of the heritage assets

The area benefits from a sense of openness, spacing and similarity of building type, which all contribute to the settings of the above heritage assets. The site, being of a character in keeping with the surrounding area, contributes in this way.

STEP 3: Impact of allocation on significance

The level of impact will depend on the built form. However, the quantum proposed in the allocation policy is likely to alter the character of these two plots significantly. Careful

consideration will need to be given to the specific design of the building. However, the degree to which the assets identified will be impacted is not considered significant.

STEP 4: Enhancements

There is limited opportunity for the enhancement of the identified assets as a result of this allocation.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

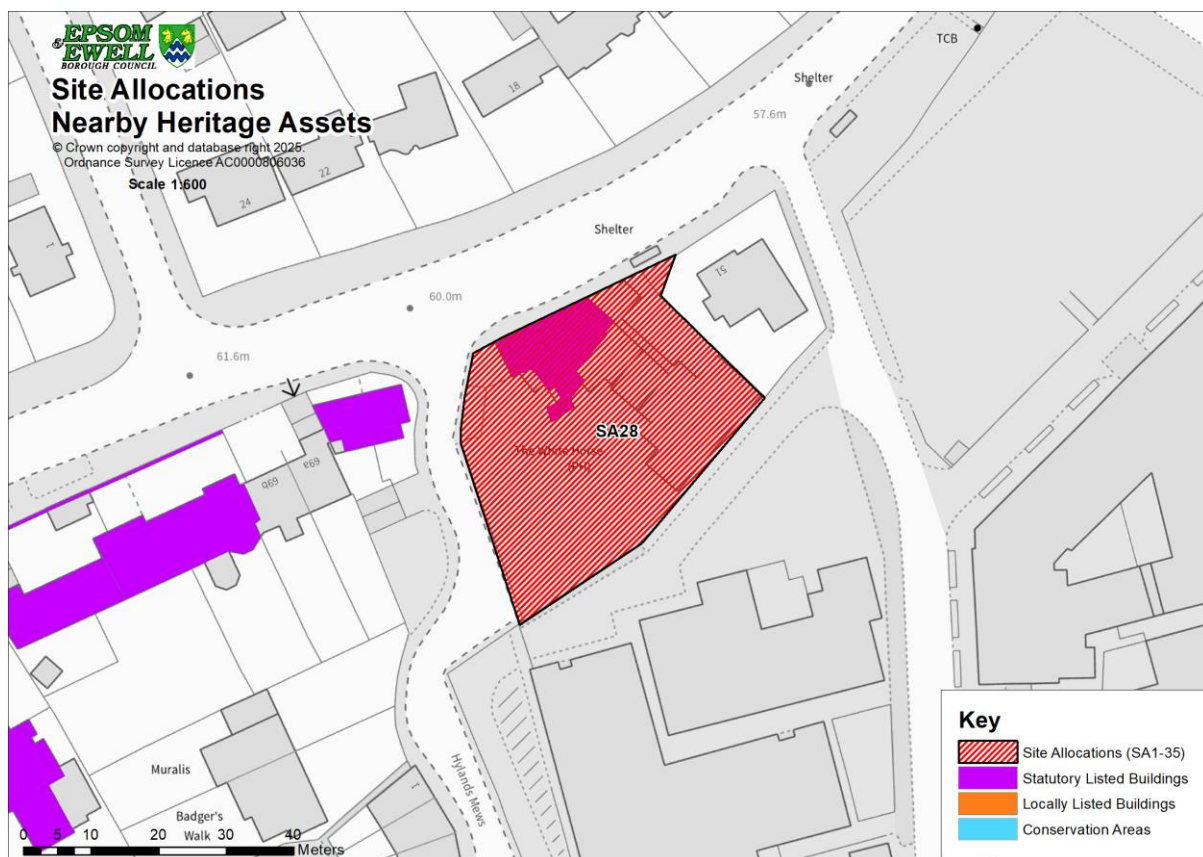
SA28: 63 Dorking Road

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following heritage assets have been identified:

Statutory Listed Buildings:

- Grade II* Listed Buildings:
 - The Hylands
- Grade II Listed Buildings:
 - 67 and 69 Dorking Road
 - New Inn
 - Tamarisk Cottage



STEP 2: Contribution of the site to the significance of the heritage assets

The site includes the New Inn, one of the Grade II Listed Buildings which makes this area significant.

STEP 3: Impact of allocation on significance

The level of impact will depend on the built form. It is very likely that the scheme will impact on this heritage asset. Careful consideration will need to be given to the specific design of the scheme.

STEP 4: Enhancements

There are opportunities as part of this allocation to improve the detailed features of this Listed Building.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

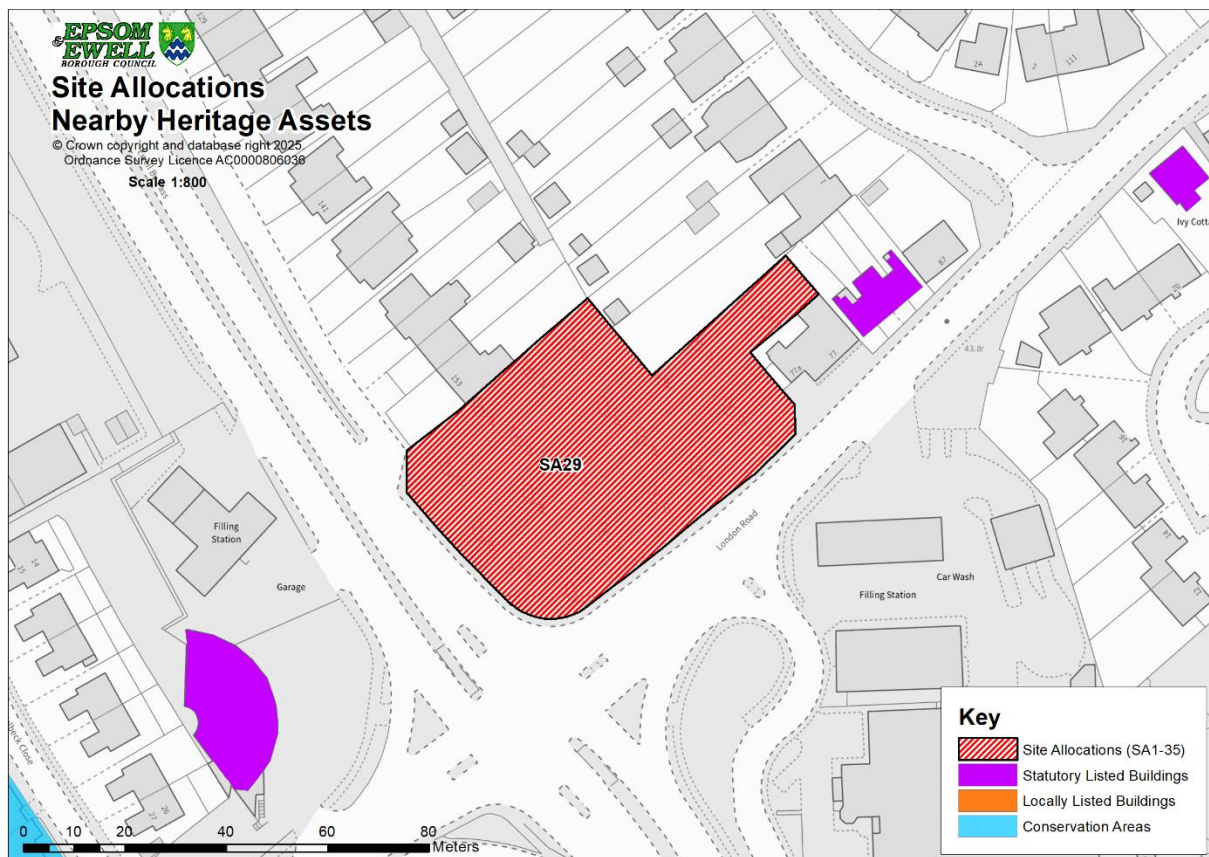
SA29: 65 London Road

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following heritage assets have been identified:

Statutory Listed Buildings:

- Grade II Listed Buildings:
 - 79-85 London Road
 - Ewell Honda
 - Ivy Cottage
 - Woodgate



STEP 2: Contribution of the site to the significance of the heritage assets

The site makes little contribution to these heritage assets.

STEP 3: Impact of allocation on significance

A Planning application for an 81 bed care home on the site has been approved and the supporting heritage statement concludes that there would be no harm to the Listed Building (79-85 London Road).

STEP 4: Enhancements

The removal of the hoarding and the placement of a well designed building will enhance the setting of the heritage assets.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA30: Epsom General Hospital

STEP 1: Identification of heritage assets

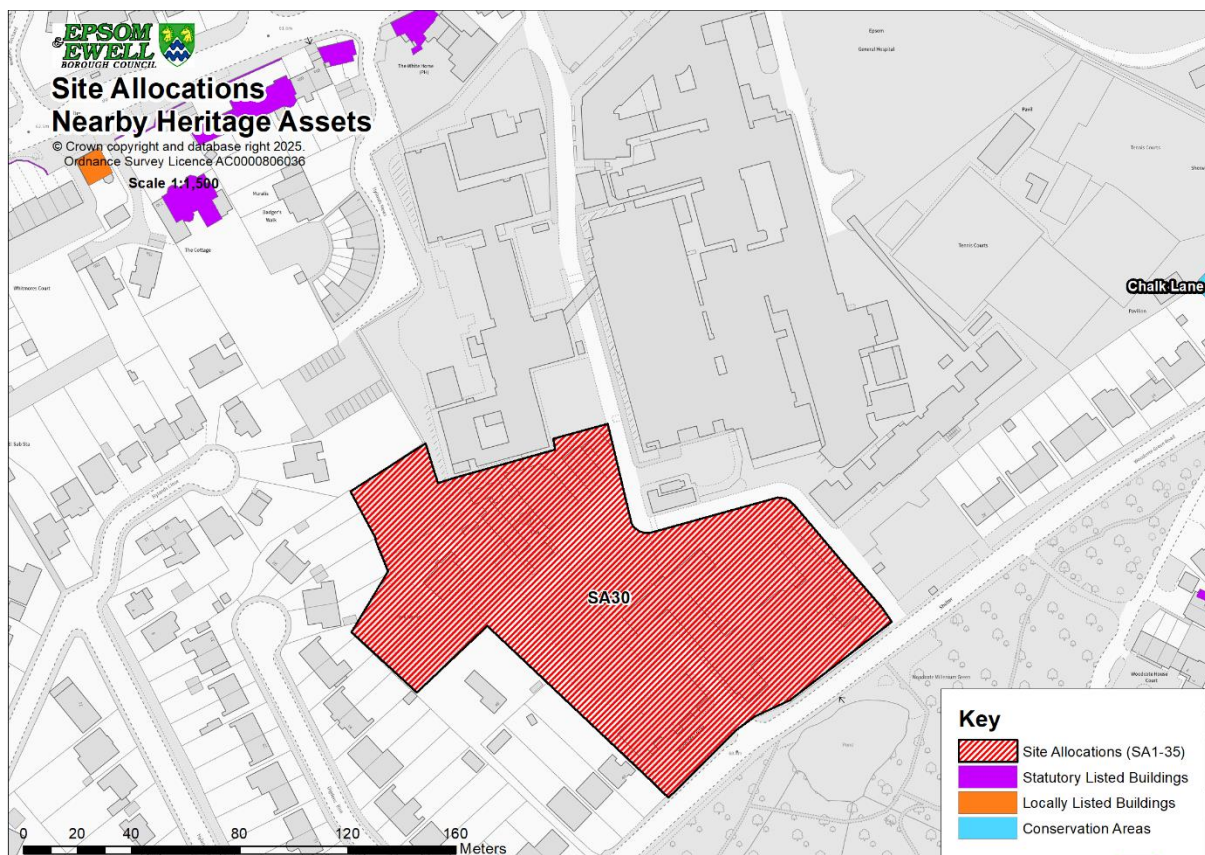
A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Conservation Area:

- Chalk Lane Conservation Area

Statutory Listed Buildings:

- Grade II* Listed Buildings
 - The Hylands
 - Hylands House
- Grade II Listed Buildings
 - 67 and 69 Dorking Road
 - New Inn



STEP 2: Contribution of the site to the significance of the heritage assets

Each of these heritage assets is significant in their own right, as described in their respective Conservation Area Appraisal or list description. The site is distinctive from the and does not contribute significantly.

STEP 3: Impact of allocation on significance

It is unlikely that a scheme that would replace the hospital buildings will have a significantly larger impact on these assets than the existing.

STEP 4: Enhancements

It is considered that there are limited opportunities for enhancement.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA31 & SA32: Land at West Park Hospital

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the sites. The following assets have been identified:

Conservation Area:

- West Park Conservation Area

Statutory Listed Buildings

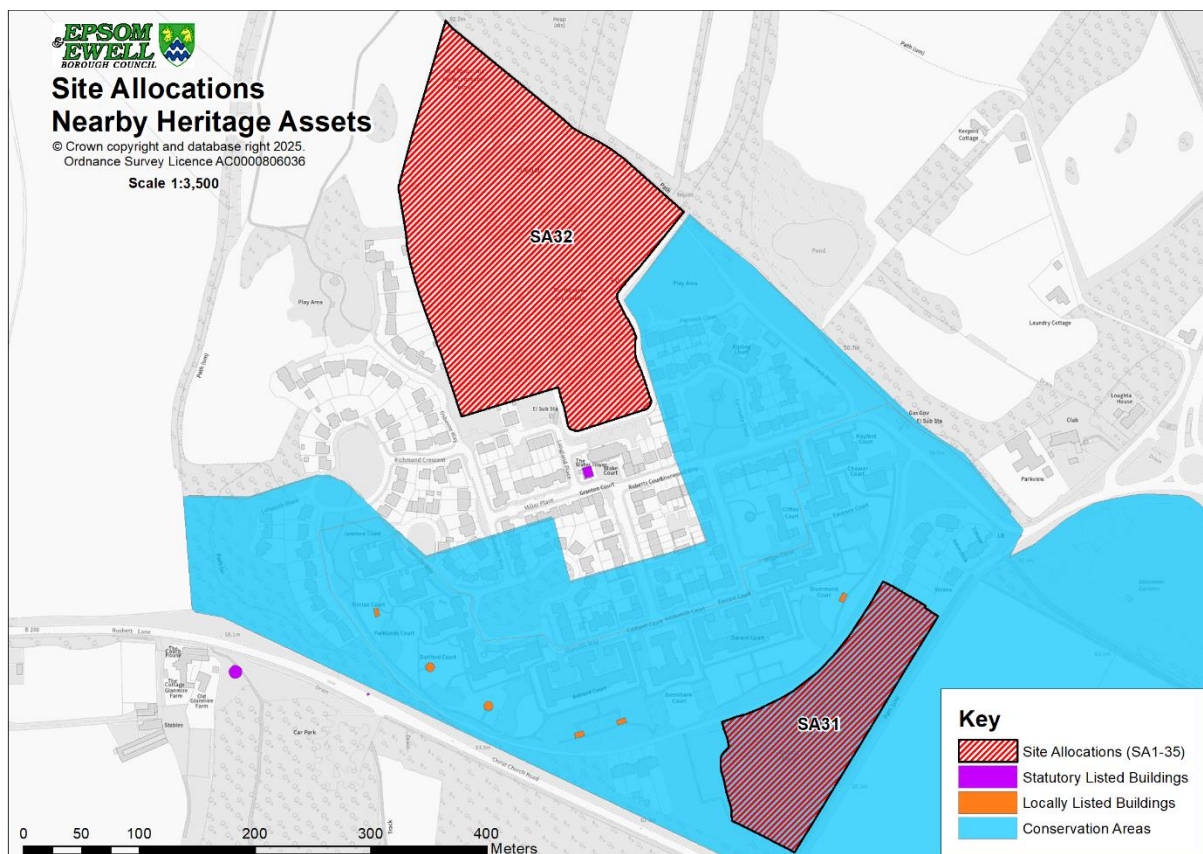
- Grade II Listed Building:
 - Water Tower at West Park Hospital

Locally listed building:

- Airing Courts (multiple)

Other heritage assets

- Roman tile Kiln Archaeological site



STEP 2: Contribution of the site to the significance of the heritage assets

Each of these heritage assets is significant in their own right, as described in their respective Conservation Area Appraisal or list description. The Water Tower, a Grade II listed building dating from the 18th is in close proximity to site allocation SA32 and part of the original development.

There are no locally listed buildings or nationally listed buildings within the site boundaries, however allocation SA31 is located within the West Park Conservation Area.

STEP 3: Impact of allocation on significance

For allocation purposes there are few known details about any future scheme in the site allocation policy, aside from quantum of development. However, there are buildings on the sites of varying age and character in addition to areas of hardstanding including areas of surface car parking and some open space. The scale of development may have a degree of impact on the Listed Building and Conservation Area.

STEP 4: Enhancements

As part of any development on this site, enhancements to heritage assets could be sought.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

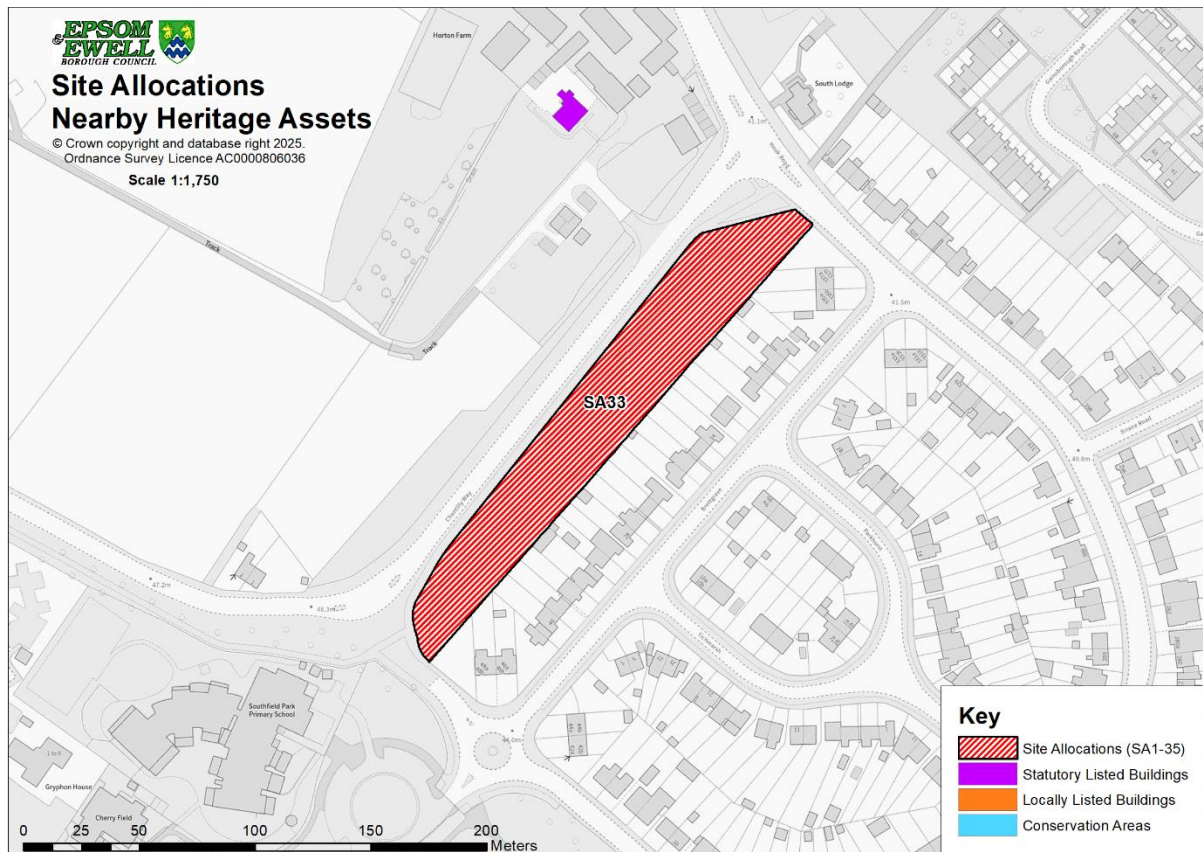
SA33: Land at Chantilly Way

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Statutory Listed Buildings

- Grade II Listed Building:
 - Horton Farmhouse



STEP 2: Contribution of the site to the significance of the heritage assets

This heritage asset is significant in its own right, as described in its list description.

Horton Farmhouse is located to the north of the site; a Grade II listed building dating from the 18th century it includes architectural features of interest including its roof, windows and doorway.

The site itself makes little contribution to Horton Farmhouse, being screened significantly by boundary treatment.

STEP 3: Impact of allocation on significance

For allocation purposes there are few known details about any future scheme in the draft allocation policy, aside from quantum of development. However, the scale of development may have a degree of impact on the setting of Horton Farmhouse.

Attention will need to be paid to the setting of the Listed building, particularly if the heights of buildings on Chantilly Way become visible from it. Regard should also be had to the cumulative impact of both Chantilly Way and the Site Allocation at Horton Farm (SA35).

STEP 4: Enhancements

It is considered that little will be able to be offered in the way of heritage asset enhancements from this relatively small site. The enhancements to Horton Farmhouse will more likely come from development at Horton Farm (SA35).

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA34: Hook Road Arena

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Conservation Areas:

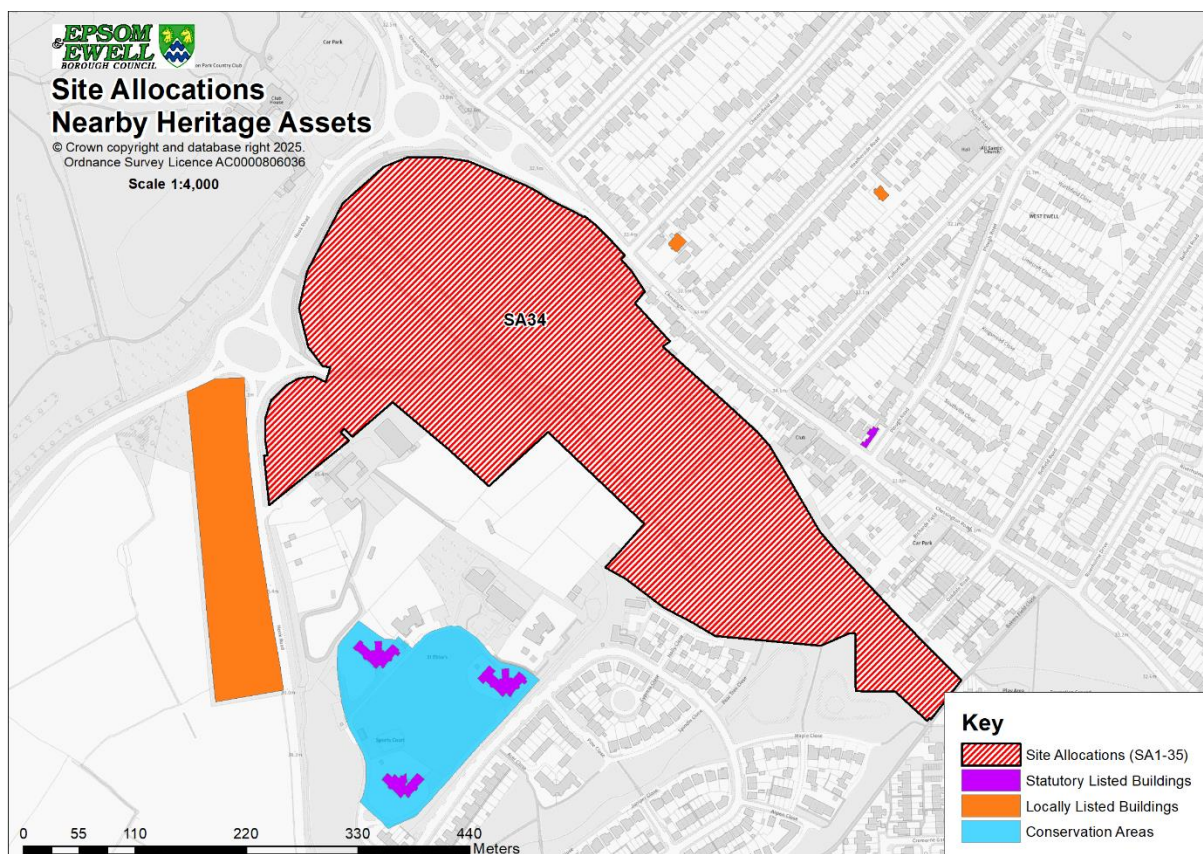
- St Ebbas Conservation Area

Statutory Listed Buildings:

- Grade II Listed Buildings
 - Villas at St Ebbas
 - Water Tower at St Ebbas Hospital
 - 222a and 222b Chessington Road

Locally Listed Buildings:

- 290 Chessington Road
- Horton Cemetery



STEP 2: Contribution of the site to the significance of the heritage assets

Each of these heritage assets is significant in their own right, as described in their respective Conservation Area Appraisal or list description.

Horton Cemetery, to the north west of the site is locally listed and comprises a high number of unmarked graves of the patients of the former Horton Hospital for the mentally ill, which served London for a significant period. As well as a strong connection with local people, it holds a particular significance in relation to the evolution of society's approach to mental health.

All other assets are outside of the site boundary of varying distance. St Ebbas Hospital Conservation Area and associated buildings are close to the site, and the site makes a degree of contribution by retaining a sense of openness adjacent to it. However, on submission of any future planning application, a more detailed Heritage Impact Assessment must be submitted, addressing the potential impacts of any particular development on this site, on those heritage assets.

The listed and locally listed buildings to the east of the site are separated by other buildings and a road, and unlikely to be impacted from a heritage perspective as a result of the development.

STEP 3: Impact of allocation on significance

For allocation purposes there are few known details about any future scheme in the draft allocation policy, aside from quantum of development, although the assumption is that residential development will be located in the southern eastern part of the site in close proximity to existing residential development. However, the scale of development may have a degree of impact on St Ebbas hospital.

Views into and out of the St Ebbas hospital could also be impacted, but the degree to which this will be detrimental will be dependent on the details of the scheme.

STEP 4: Enhancements

As part of any development on this site, enhancements to heritage assets should be sought. This could include but not be limited to: further research and recording of the contribution of Hook Road Arena to St Ebbas Hospital as part of any application specific Heritage Impact Assessment; open space provision and traffic management provision as part of access arrangements to any potential development.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation would bring, there is no evidence to suggest that the principle of allocation would be unsound.

SA35: Horton Farm

STEP 1: Identification of heritage assets

A site inspection and GIS analysis has been conducted to identify heritage assets in and nearby the site. The following assets have been identified:

Conservation Areas:

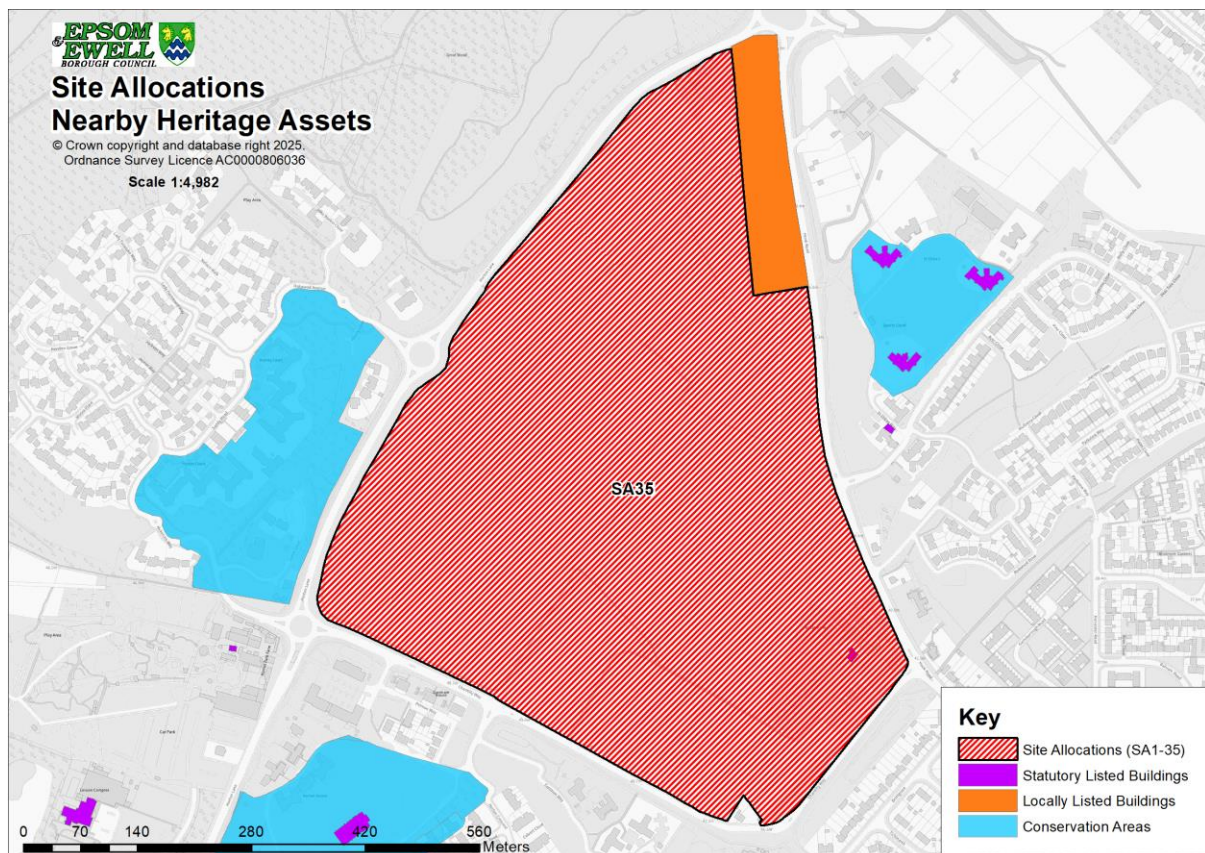
- St Ebbas Conservation Area
- Long Grove Conservation Area

Statutory Listed Buildings

- Grade II Listed Buildings
 - Villas at St Ebbas
 - Water Tower at St Ebbas Hospital
 - Horton Farm House
 - Granary (to south-west of site)

Other heritage assets:

- Horton Cemetery (north-east of site)



STEP 2: Contribution of the site to the significance of the heritage assets

Each of these heritage assets is significant in their own right, as described in their respective Conservation Area Appraisal or list description.

Horton Farmhouse is located within the site; a Grade II listed building dating from the 18th century it includes a number of architectural features of interest including its roof, windows and doorway.

Horton Cemetery, on the northeast boundary of the site is locally listed and comprises a high number of unmarked graves of the patients of the former Horton Hospital for the mentally ill, which served London for a significant period. As well as a strong connection with local people, it holds a particular significance in relation to the evolution of society's approach to mental health.

All other assets are outside of the site boundary of varying distance. With the exception of Horton Hospital), there are no obvious specific connections between them or the site. However, on submission of any future planning application, a more detailed Heritage Impact assessment will be required, addressing the potential impacts of any particular development on this site, on those heritage assets.

STEP 3: Impact of allocation on significance

For allocation purposes there are few known details about any future scheme in the draft allocation policy, aside from quantum of development and the requirement for a new public park of approximately 7ha within the land to the North of the site which is anticipated to border the locally listed cemetery which is currently overgrown and inaccessible. Attention to the cemetery as part of a comprehensive planning application, subject to developer agreement with the adjacent landowner, could result in an enhancement of this site, allowing the space to be better enjoyed and as a space of reflection.

As for the Grade II Listed Horton Farmhouse, this building will need to be retained as part of the development and its setting thoroughly considered. It is located in the lower part of the site, which may offer opportunities in terms of adaptation and sensitive layout.

STEP 4: Enhancements

As part of any development on this site, enhancements to heritage assets could be sought through master planning.

STEP 5: Appropriateness in light of NPPF soundness tests

The principle of allocation on this site is considered sound in the context of the National Planning Policy Framework (NPPF). Whether there would be substantial harm or less than substantial harm to relevant heritage assets would be dependent on the details of future planning applications on this site. However, taking into consideration the quantum proposed in the allocation policy, the area of the overall site and the public benefit that the allocation