From: Christopher Reynolds <Christopher.Reynolds@surreycc.gov.uk>

Sent: 10 August 2022 18:08

To:Sean ScottCc:Statutory

Subject: 2022/685 Land at The Old Cottage

Attachments: 2022'685 Land At The Old Cottage, Station Road, Lingfield.doc

Dear Sean,

Please find attached our comments on 2022/685 Land at The Old Cottage.

Kind regards,

Chris Reynolds

Senior Historic Buildings Officer

Historic Environment Planning, Surrey County Council, Quadrant Court, 35 Guildford Road, Woking, GU22 7QQ 07790 952958*

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^{*}I have limited access to this phone so please email in the first instance

To: Planning Department of Tandridge District Council

From: Historic Environment Planning: Historic Buildings

Application Number: TA/2022/685

Planning Officer: Sean Scott

Designation: Conservation Area and Setting of Grade II, II* and I and Locally Listed

Date Consultation Received: 20/07/2022

Address: Land at The Old Cottage, Station Road, Lingfield, RH7 6PG

Proposal: Outline application with all matters reserved except for access and layout for a residential development of 99 dwellings (40% affordable) with associated access, formal open space, landscaping, car & cycle parking and refuse. (The application site is located within Lingfield Conservation Area and affects the setting of Listed Buildings and Structures).

Drawings: Heritage Impact Assessment; Landscape and Visual Impact Assessment; Design and Access Statement; Planning Statement; Indicative Tenure Distribution; 1000 Rev C;

Comments:

The header shows that the historic environment considerations are the character and appearance of the conservation area and the setting of nearby listed buildings. Special regard has to be had to these matters in the determination of the application in accordance with sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The effect on the significance of a locally listed building should also be taken into account when assessing the application in line with paragraph 203 of the NPPF which requires a balanced judgement with regard to the scale of any harm or loss and the significance of the heritage asset.

The applicant has provided a detailed heritage statement and has carried out a search of the Historic Environment Record to meet the requirements of paragraph 194 of the NPPF. The applicant has split the built heritage assets into five groups which I shall use for ease of reference. For clarity these are:

- Lingfield Conservation Area
- The Church of St Peter and St Paul (Grade I)
- Listed buildings to the west of Church Road group, comprising of:
 - Pollard Cottage (Grade I)
 - Church House and Star Inn Cottages (Grade II*)
 - Old Town House and Old Town Cottage (Grade II*)
 - Church Gate Cottage (Grade II)
 - The Barn (Grade II)
 - Barn 15 yards south-west of Old Town House (Grade II)
 - The College (Grade II*)
 - Garden Wall to the East of The College (Grade II)
 - The Guest House (Grade II*)
 - Three tombs in the grounds of Lingfield Church (all Grade II)



- Listed buildings in The New Place group, comprising of:
 - New Place (Grade II*)
 - o Garden Wall to New Place (Grade II)
 - The Old Cottage (Grade II)
- Locally listed buildings comprising of:
 - New Place Farm
 - Cyder Barn

The impact on the heritage assets will vary within some of the aforementioned categories so where possible I have highlighted which assets have the potential to be more or less affected by the scheme. Owing to the outline nature of the scheme it is difficult to fully assess the impact of the development on the heritage assets and it would have been much more helpful if some of these details could have been provided at this stage of the application, particularly the appearance and scale of the dwellings.

The application site is a set of fields (known as Star Fields) mostly located within Lingfield Conservation Area which join the two separate areas of Church Town to the west and New Place to the east. The openness of Star Fields reinforces the distinction between these two separate, but important, historical sites in Lingfield. I consider this to make a contribution to the special interest of the Conservation Area. It is a matter of fact that the fields are within the Conservation Area and have been so since 1972. Star Fields are located within the Church Town part of the Conservation Area.

Church Town developed following the founding of a college for secular chaplains in 1431 by Reginald de Cobham with the Church of St Peter and St Paul at its centre. This drove a period of prosperity in Lingfield which Peter Gray and Kay Percy suggested lasted to 1500 with a further period of prosperity around 1600 possibly linked to the Reformation. Many of the buildings around Church Road date from this period including Old Town House (late 16th century), Pollard Cottage (15th century) Church Gate Cottage (early 17th century), Church House and Star Inn Cottages (16th century), The Barn (17th century) and Barn 15 yards south-west of Old Town House (17th century). These form a very clear coherent settlement which would have historically been surrounded by open fields and orchards as was still the case when the 1869 OS map was produced. This gave Church Town a clear and distinctive appearance as an individual and isolated settlement which grew independently from the development around Gun Pond to the south-west and New Place to the east.

These buildings form the aforementioned 'listed buildings to the west of Church Road group' referenced in the heritage statement. As a collective group their historic interest can be summarised as a small development based around the collegiate Church of St Peter and St Paul dating from the 15th to 17th centuries. Key aspects which reinforce this interest include the physical separation from other developed areas of Lingfield and views out toward Star Fields. While such views to Star Fields are limited by The Star Inn, the open nature of the field frames the background of the building and is a kinetic view as one moves north past the public house. There are also views from the first floor and attic windows of Church House and the first floor of Pollard Cottage. I do not consider there are clear views of Star Fields from any of the remaining listed buildings in this group.

While the Church Road group of listed buildings is visible across Star Fields, these are much less prominent owing to tree coverage and only Church House can be clearly identified owing to its windows on the first and attic floors. Much more clearly identifiable is the Grade I Church of St Peter and St Paul which is prominent in kinetic views along Station Road where it is framed by Star Fields. This forms an important part of its setting and enables Church Town to remain clearly identifiable from a distance as a distinct settlement. The Design and Access Statement incorrectly shows this as being prominent in just one view point, but it is in fact continuous along much of Station Road. This

view contributes to the building's setting by not only revealing its rural setting but its importance as the centre of the Church Town area of Lingfield.

To the east of Church Town is the New Place group, at the core of which is the Grade II* listed New Place and its associated Grade II listed wall. This is an impressive small scale country house set apart from the rest of Lingfield not only by its location but also through the use of stone making it unique for a house in the parish from this date (there are few stone buildings in Lingfield owing to the underlying geology). Adjacent to this is the Old Cottage which was one of the first brick built houses in the parish, said to date to 1743. The isolation of both of these buildings from the rest of the settlement has gradually been eroded through development. Owing to the existing hard and soft boundaries I do not consider that Star Fields makes a contribution to the setting of The Old Cottage. However, there are clear views of Star Fields both to and from New Place which reveal its historic and architectural significance as a small country house.

The remaining group of heritage assets are the locally listed buildings which consist of the Cyder Barn on the east side of Station Road and New Place Farm. The Cyder Barn is a converted apple store and dovecot built around 1880 on the east side of Station Road. The consultant and I agree there would be no impact on the setting of this building owing to its separation from the site so it is not discussed further. With regard to New Place Farm, this consists of a small farmstead with a prominent oast house set in Star Fields which is of clear historic and architectural interest. The building has a close association with the rural landscape owing to its historic function. There are views of the building along Town Hill which are framed by Star Fields and reveal its architectural interest. This makes some contribution to its setting.

The application is for outline permission for a development of 99 dwellings with all matters reserved except for access and layout. Owing to its location within the Conservation Area the scheme has the potential to cause a great deal of harm owing to the loss of the semi-rural setting of the aforementioned heritage assets and infilling of a site which helps understand the separate development of distinct areas of Lingfield. As part of the heritage statement, the consultant has provided quite a detailed assessment of the level of harm to each aspect which I have commented on below.

The scheme will result in the infilling of part of the Conservation Area which is important for understanding the historic interest of the development of Lingfield, particularly on the approach from New Place to Church Town. The development will harm views of the Conservation Area from Station Road but more concerning will likely be visible behind The Star Inn along Church Road. Owing to the nature of the application, I do not consider it has been proven that the development is possible without causing a great deal of harm – currently the plans show a large slate roofed building, which would certainly be an inappropriate backdrop to views from this part of the Conservation Area. For this reason, I consider the application will result in a high degree of less than substantial harm to the Conservation Area. Were the applicant willing to provide details of the appearance, form and height of the proposed buildings as part of application (rather than reserve them), I would be willing to reconsider this level of harm and may be more of a mind to agree with the consultant.

The development will also lead to the loss of views of the Grade I Church of St Peter and St Paul and the loss of the fields which give it a rural setting. The consultant has argued that this will only result in a low level of harm because some views will remain and there would be greater access public access from Star Fields (discussed later). I disagree with this in that the fields reveal the rural origins of the church and this will be lost through development. The developer has also made a point to demonstrate that a key view will be retained from Station Road as part of the development, but in fact this appears to terminate in a set of trees which will ultimately block views of the church. The current plans also show the two slate roof 'oast house' buildings framing this view, which I consider would challenge the prominence of the church tower. Taking all this into consideration I consider that this

will result in a moderate degree of less than substantial harm to the setting of the Grade I listed building.

The consultant has argued that overall the development will result in a low to negligible level of less than substantial harm to the listed buildings to the west of Church Road group on the basis that the view of the church spire does little to reveal the significance of the individual listed buildings and structures. I consider that he has not looked at the views from the individual buildings in this group toward Star Fields. There are very clear views of the site from Church House (Grade II*) and some views from Pollard Cottage (Grade I) which in both cases reveal the rural development of Church Town as a settlement. I consider in the case of these two specific listed buildings there is a demonstrable amount of less than substantial harm, even if it is to the lower end of spectrum owing to the fact that such views are limited to specific windows.

As noted above, there are views to and from the application site from New Place. These views reinforce the degree of separation between New Place as a Grade II* country house and Church Town as a distinct settlement. Again, I consider that such harm would be toward the lower end of the less than substantial harm spectrum. I do not consider there is any impact on The Old Cottage.

The final aspect is the impact on New Place Farm. The consultant has noted that the impact on this 'would not be determinative in itself'. I am not sure of the meaning of this comment as my understanding is the impact of all heritage assets should be considered, even if they are only locally listed. In this case there would be quite a high degree of harm to the setting of the locally listed building because of its strong association with the surrounding rural landscape. There will also be loss of views of the oast house from Station Road. Were this to be a designated heritage asset, I would place it to the higher end of less than substantial harm because the landscape forms an important part of the significance of the building.

The consultant has noted the above should be considered against any heritage specific public benefits as part of a net heritage balance and argues that the proposed public open space within the conservation area should be considered a benefit because of increased views toward the church spire and historic core. Owing to the topography of the site and the surrounding trees, I am not convinced there actually would be anything but glimpsed views of the church so can only afford this a small degree of benefit. I would urge you to consider whether the space by itself would consist of much of a public benefit as it is really guite small.

In addition to the above, there are a number of aspects of the development which fall under reserved matters that are worthy of comment at this point. I am a quite concerned by the emerging architecture of the scheme. The application currently shows two slate covered oast houses framing the entrance to New Place Farm. I consider these to be highly inappropriate and not only because they confuse the understanding of the farmstead, but because slate is not a vernacular Surrey material. To suggest that Lingfield would have had oast houses with slate roofing would not reflect the nuances of the area. The oast houses would also frame views toward the church and reduce its prominence as mentioned previously.

The garaging shown on the illustrative street scenes in the Design and Access Statement appears as if it has been tacked on the side of the building with little thought as to how it relates to the main structure. While this may be appropriate for the odd house, to have it on a continuous street scene sketch looks odd and could benefit from some further consideration. While such structures may have been weatherboarded historically, it may be better to build them in brick and look at using weatherboarding on the houses instead if the intention is to bring relief to the monotony of materials. In Limpsfield garaging was achieved by terracing the houses in Stanhopes, which may be a better way of achieving this outcome.

I am also concerned about the proposed height and form of the buildings which is currently a reserved matter. I have based my comments on the basis of the buildings being two storeys, although some of the drawings are quite clearly for 2 ½ storeys. Were the height of the buildings to be increased further, particularly close to Church Town then I would have to push more strongly for refusal. At the current time I am still not convinced this development is possible without causing quite a great deal of harm to the Conservation Area.

I have assessed this application in accordance with paragraphs 195 and 199 of the NPPF. I have found the application will result in harm to the following:

- A high degree of less than substantial harm to Lingfield Conservation Area owing to the infill between Church Town and New Place, loss of views from Station Road and views of modern housing along Church Road.
- A moderate degree of less than substantial harm to the Grade I listed Church of St Peter and St Paul owing to the loss of views of the spire and reduction in prominence.
- A low level of less than substantial harm to the Grade I Pollard Cottage and Grade II* Church
 House owing to the loss of rural views from windows in the buildings which enable the isolated
 development of Church Town to be understood.
- A low level of less than substantial harm to the Grade II* listed New Place owing to the loss of views of its historic rural surroundings which enable its development as a small country house separate to Church Town to be understood.

There is a small heritage benefit from the provision of public space within the Conservation Area which will allow some limited views of the Church of St Peter and St Paul. Owing to the fact this is only a small benefit, the aforementioned harm greatly outweighs this and results in net harm.

In line with paragraph 199 of the NPPF great weight must be applied to this harm and greater weight applied to those buildings which are designated Grade I and II*. Should this go to planning committee, please make sure you make it clear that great weight must be applied to this harm in carrying out the statutory duty with regard to the impact on conservation areas and listed buildings.

The application will also result in a high degree of harm to the setting of New Place Farm which is locally listed. I consider this harm to be high because its rural surroundings are an important part of understanding the historic function of the building. Normal weighting should be applied to this.

The above will all need to be taken into account as part of an overall planning balance to assess the benefits of providing housing in the district. I am of the opinion that the impact on the aforementioned heritage assets could be used as a reason for refusing the application should the proposal not balance favourably.

I would support the applicant withdrawing the application to provide more details about the appearance and scale of the development should they wish to demonstrate that the scheme can be achieved with a lesser degree of harm. However, I do not think that the impact on the aforementioned heritage assets can be entirely removed and there will always be a degree of harm from developing this site which will need to be considered as part of a planning balance.

Signed: Chris Reynolds Date: 09/08/2022

File Ref: 32/10/Gen For the Director for Community Protection, Transport & Environment