



Historic England

SOUTH EAST OFFICE

Ms Rebecca Clarke  
Waverley Borough Council  
Council Offices  
The Burys  
Godalming  
Surrey  
GU7 1HR

Direct Dial: 01483 252071

Our ref: P00964221

16 October 2018

Dear Ms Clarke

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND BETWEEN NEW WAY AND, AARONS HILL, SURREY  
Application No. WA/2018/1239**

Thank you for your letter of 31 August 2018 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

*Summary*

Historic England has identified a degree of harm to the grade II\* listed Westbrook House, and its associated grade II garden, which together represent an important moment in the history of the country's nineteenth century conservation movement. We do not think the current application adequately assesses the harm in its current form, and we anticipate that once that exercise is carried out, there may be opportunities to further mitigate harmful impacts arising from development within the setting of Westbrook, a requirement of the NPPF. We therefore encourage your authority to seek further information, and then consider whether the scheme can be amended to reduce the harmful impacts. Remaining harm must be fully justified in NPPF terms, and the scheme only permitted if public benefits exist that would outweigh the harm.

*Significance*

Westbrook was designed by Thackeray Turner, the nationally important Arts and Crafts architect and exponent of building conservation. It is encircled by grade II registered gardens by the equally important designer, Gertrude Jekyll. Here the combination of Thackeray Turner and Jekyll's work creates an idyllic composition. Westbrook's grade II\* listing recognises it as being of more than special architectural and historic interest, from which a strong sense of associative significance is derived.



EASTGATE COURT 195-205 HIGH STREET GUILDFORD SURREY GU1 3EH

Telephone 01483 252020  
HistoricEngland.org.uk





SOUTH EAST OFFICE

Not only was Westbrook Thackeray Turner's home, but it was his principal work. The building conservation community derives communal value from Thackeray Turner's alignment with the principles of the Society for the Protection of Ancient Buildings (SPAB), as a champion of building conservation being a contemporary of William Morris and as the SPAB's first paid Secretary. This contribution to significance is embodied in Westbrook's conservation and the currently well-considered approach to the management of change being undertaken by the current owners. Historic England is able to provide comments in terms of assessing harm, however your Council should be aware that broader and intellectual issues of building conservation practice are likely to be relevant here.

*Current application*

It is the interrelationship between Westbrook's house, garden and wider setting that the current heritage statement fails to adequately assess. Consequently, an understanding of how the proposed development is likely to impact on the grade II\* listed house or its setting has not yet been fully explored.

The NPPF requires an applicant to describe the significance of any heritage assets affected by an application and this should include any contribution made by their setting (NPPF paragraph 189). This has not yet been achieved by the heritage statement and we therefore consider the current application to fall short of the requirements of the NPPF.

We have, however, visited the site, and Westbrook itself, and now offer the following comments:

*Setting of Westbrook and its garden*

Thackeray Turner purchased farmland in this location specifically to build his family home. Its rural location, surrounded by open farmland at the terminus of Westbrook Road, establishes a strong sense of isolation. The northern views across the valley to Charterhouse School and Holt (home of Ruth Turner, Thackeray Turner's daughter and her husband George Mallory) are impressive and further reinforce Westbrook's sense of separateness, however, this is not the only intended vantage point.

The heritage statement does not fully appreciate the intentional outward views from rooms orientated to the south and west. The ground floor principal rooms, entertaining spaces and first floor principal bedrooms are consistently dual aspect, and this arrangement encourages appreciation of the gardens and, in some instances, longer views of the farmland and Surrey hills beyond. This is also the case for some of the second floor family and service rooms. We therefore recommend that an additional impact assessment is required to assess if the proposed development will impact on the intended views from the house out towards the surrounding open farmland. This should include (winter) photo montages, to determine if new housing will be visible and





to what extent.

Although not within our remit, we remind your Council that the setting of the grade II registered garden is, in planning terms, a material consideration and one which requires attention. Whilst Jeykll's garden mainly comprises of a series of inward facing garden rooms, as well as wide stretches of lawn, all contained within boundary hedging, there are designed features which utilise Westbrook's hill top and rural location. The 'thunder box', an elevated vantage point from which storms are viewed as they roll across the Surrey hills, is sited on the western boundary. The garden also contains strong axial walkways and focal points that intentionally draw the eye beyond the garden's formal boundary. Again, we recommend that further assessment from these viewpoints is required to ascertain if the proposed development will be visible from the thunder box and prescribed views throughout the garden, and to what extent.

Once further information has been received, as described above, it is then for your Council to assess the impact and any associated harm. Whilst the level of harm is likely to be less than substantial, we think that it is likely to cause some harm to the values we have described above. Historic England thinks it probable that some of the anticipated negative impacts of the scheme could be mitigated by for example, changes to the proposed development's layout and design by reducing unit heights and by stepping dwellings well back from the site boundary.

#### *Wider setting*

Setting is not exclusively restricted to views and there are wider setting issues to consider. Setting is described as being the surroundings in which a heritage asset is experienced and its extent is not fixed. Setting can contribute to the significance of a heritage asset and allow that significance to be appreciated. In this case, an important aspect of Westbrook is its sense of isolation within a rural landscape and the way in which this is experienced, particularly from the rear of the house and gardens.

Although views are important to setting, the way in which we experience it is influenced by other environmental factors such as noise, dust and vibration. The proposed introduction of urban development to the application site will undoubtedly generate unwelcome change in terms of additional noise, traffic and pedestrian movement.

In this way, we therefore think that the proposed introduction of urban development, at the quantum and density proposed particularly to the north of the development site, is likely to negatively impact on the setting of Westbrook by eroding the established rural character of the landscape in which it sits. This will be harmful to the listed building's significance and special interest. Whilst we again consider this harm to be less than substantial, it would markedly affect how the property is perceived and experienced and thus should be serious enough to be a material consideration when determining this application.





*Policy*

NPPF is clear that heritage assets are an irreplaceable resource and that they should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (NPPF paragraph 184). We think that the current application is contrary to this objective as urbanisation across the whole site will permanently erode Westbrook's setting.

When considering the impact of proposed development on the significance of the designated heritage asset, great weight should be given to the asset's conservation. No other planning consideration is given a greater sense of importance in the NPPF. The more important the asset, the greater the weight should be (NPPF paragraph 193). In this case as Westbrook is of more than special interest and listed at grade II\*, greater weight should be applied to its conservation.

Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. The NPPF recommends a sequential approach to assessing harmful impacts: harm should first be avoided, and then minimised (para 190). Where harm would remain, this should be fully justified, and balanced against the public benefits associated with the proposals (paras. 194, 196).

We have not identified any heritage benefits (a form of public benefit) associated with the proposals. It is not our role to assess the importance of other public benefits, such as provision of housing, but remind you that the housing provision (perceived benefit) in this case is not directly linked to Westbrook, the harm to which would be incidental to an otherwise unrelated application

**Recommendation**

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 189, 193 and 194 of the NPPF.

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





Historic England

SOUTH EAST OFFICE

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

Yours sincerely

**Liz Pollard**

Assistant Inspector of Historic Buildings and Areas

E-mail: [Liz.Pollard@HistoricEngland.org.uk](mailto:Liz.Pollard@HistoricEngland.org.uk)



EASTGATE COURT 195-205 HIGH STREET GUILDFORD SURREY GU1 3EH

Telephone 01483 252020  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*