



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

21 November 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 5 November 2018 regarding further information on the above application for planning permission. On the basis of this information, 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 represents an important moment in the history of the country's nineteenth century conservation movement. We think that the harmful impacts arising from the proposed development within the setting of Westbrook have not been mitigated as required by NPPF. We therefore encourage your authority 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 that harm.

*Application amendments*

We described in detail Westbrook's significance, setting and wider setting in our letter dated 16 October 2018 to which we refer. As we considered that the heritage statement inadequately assessed both Westbrook's significance and setting, our previous letter recommended that an additional impact assessment was required. We also recommended that winter photo montages were required to determine if new housing will be visible and to what extent.

We have now reviewed the supplementary built heritage clarification statement (1 October 2018) and amended plans. It is disappointing that a further visual



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assessment has not been submitted in line with our recommendations. The heritage statement and built heritage clarification statement are largely desk-based assessments as we understand that they have regrettably been produced without visiting Westbrook and its garden. On this basis, we presume that accurate visualisations cannot be provided and the supporting documentation is unable to fully articulate the likely impact of the proposed development on the grade II\* listed house and its grade II registered garden.

The NPPF requires and applicant to describe the significance of any heritage assets affected by an application and this should include any contribution made by their setting (paragraph 189). This has not been achieved by the current application and we therefore consider that it falls short of the requirements of the NPPF remembering that Westbrook is a grade II\* listed building (with only 5.8% of all listed buildings listed at grade II\*).

Turning to the built heritage clarification statement, and whilst we do not wish to comment in detail, it does not acknowledge Jekyll's extensive topographical knowledge as a Godalming resident. Her skilful creation of outdoor garden rooms at Lindisfarne Castle and Castle Drogo exemplify an understanding and creative use of geographical context. In both examples the intimacy of an Arts and Crafts garden room is heightened by clever use of juxtaposition with the surrounding dramatic, open, natural landscape. The same can be said of Westbrook, with the garden's distinctly intimate and manicured character contrasting with that of the surrounding open agricultural farmland. Although this element of design may not be documented, it contributes to the way in which the garden and house are experienced (setting) and their significance. We reiterate our previous comments relating to the setting of Westbrook (16 October 2018).

As a side note, the absence of documentary evidence does not prove the absence of intention, as inferred by the clarification statement. Indeed, Jekyll's first garden at Munstead Wood, her own home, was created without known written plans.

We note the minor amendments in the scheme's house design and master plan, but think that they fall short in terms of minimising the probable negative impacts of the scheme. Therefore, we continue to recommend that these anticipated negative impacts could be mitigated by changes to the proposed development's layout and design by further reducing unit heights and stepping housing further back from the site's northern boundary.

*Wider setting*

Again, we stress that setting is not exclusively restricted to views and there are wider setting issues to consider. In assessing setting we direct your authority to Historic Environment Good Practice Advice in Planning Note 3; The Setting of Heritage Assets

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>



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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, light, traffic and pedestrian movement and as a consequence erode Woodbrook's well-established sense of isolation and separateness. We consider that the amended plans have not acknowledged or addressed these likely negative impacts.

Our previous comments remain current in that we 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 (as discussed in our previous letter). This will be harmful to the grade II\* listed building's significance and special interest. Whilst we 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. However, this harm could be minimised by limiting housing to the lower southerly two thirds of the site, thus retaining open land to the north.

*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 the 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 (paragraph 190). Where harm would remain, this should be fully justified, and balanced against the public benefits associated with the proposals (NPPF paragraphs 194, 195).

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



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as provision of housing, but remind you that the housing provision (perceived benefit) in this case is not directly linked to Westbrook, then 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, 190, 194 and 195 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.

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

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cc: Russell Morris, Conservation Officer, Waverley Borough Council



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