

NUTFIELD GREEN PARK

HERITAGE STATEMENT

OCTOBER 2023

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1. Introduction

1.1 SCOPE OF THIS REPORT

1.1.1 Description of the proposed development

This report, commissioned by Nutfield Park Developments Limited, presents the findings of a cultural heritage assessment for proposed development of the former Laporte Works Site, Nutfield which was an operational mineral extraction and processing facility until 1986 before it was decommissioned in 1997 (**Figure 1**). The former Works comprises a mixture of grassland, blocks of self-seeding woodland and waterbodies with an area of the former infrastructure remains, such as access roads and pipework and former settlement lagoons.

Nutfield Green Park seeks outline planning permission for the development of the site for new homes and an Integrated Retirement Community, the creation of new access, landscaping and associated works to facilitate the development, to be carried out in phases. The extent of the total planning application area is 58.8ha. The Proposed Developed Area (PDA) is 7ha. The centre of the application area is at approximately TQ 3040 5093.

The full description of the proposed scheme is discussed elsewhere in the Planning Statement and Design and Access Statement.

The indicative masterplan is shown on **Figure 2** and a cross section at **Figure 3**.

1.1.2 Scope of cultural heritage

Cultural heritage is represented by a wide range of assets that result from past human use of the landscape. These include historic structures, many still in use, above ground and buried archaeological monuments and remains of all periods, artefacts of anthropological origin and evidence that can help reconstruct past human environments. In its broadest form, cultural heritage is represented by the landscape and townscape itself.

Assessments should consider both direct and indirect effects upon cultural heritage. Indirect effects can occur as a result of significant changes to the setting of a landscape or heritage asset, whether permanent or temporary. This is particularly relevant to designated heritage assets, such as Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Parks and Gardens.

This assessment has considered direct effects within the planning application area and the PDA and indirect effects upon the setting and significance of the relevant heritage assets.

1.2 DESK-BASED RESEARCH

In order to assess the effects of the potential scheme, cultural heritage information within and up to 2km from the PDA was examined.

A variety of sources were consulted including the Surrey Historic Environment Record, the National Monuments Record, Defra Magic Database, Historic England Archive, maps and readily available local history materials. A site walkover and visit to designated heritage assets was undertaken in April 2020.

All work has been undertaken in accordance with *Standard and Guidance for Archaeological Desk-Based Assessment* (Chartered Institute for Archaeologists 2008, revised 2012).

1.3 AUTHORSHIP

Andrew Josephs (BA Hons Archaeology and Environmental Studies) is Managing Director of Andrew Josephs Associates, a consultancy specialising in cultural heritage founded in 2002. Andrew has extensive experience of all periods and facets of cultural heritage. He is involved primarily in planning applications, Environmental Impact Assessment ('EIA') and the design of mitigation strategies on developments with heritage constraints. Currently Andrew is heritage consultant to over 100 companies across Europe.

He has undertaken in excess of 1000 cultural heritage assessments since becoming one of the UK's first archaeological consultants in 1992. He was previously Principal Consultant (Director of Archaeology) at Entec (now Wood) and Wardell Armstrong. Prior to 1992, he worked as a field-based archaeologist and researcher for universities and units in the UK, Europe and the USA.

He has lectured widely and was visiting lecturer in EIA at the University of Nottingham.

1.4 RELEVANT LEGISLATION, POLICY AND GUIDANCE

The importance of cultural heritage is clearly recognised at both national and local levels.

1.4.1 *Legislation*

The statutory legislation relating to the historic environment that is most relevant to the proposed development is:

- Planning (Listed Buildings and Conservation Areas) Act (1990)

In particular, S66 of the Act states that:

In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

1.4.2 *Planning Policy*

The main national planning policies relevant to this assessment are:

National Planning Policy Framework

National planning policy on how cultural heritage should be assessed is given in the National Planning Policy Framework 2023. This covers all aspects of heritage and the historic environment, including world heritage sites, scheduled monuments, listed buildings, conservation areas, registered parks and gardens, battlefields and archaeology.

The key paragraphs of particular relevance to this application are:

194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include,

heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

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

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

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

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.¹*

201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

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

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

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

¹ Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

Planning Practice Guidance (PPG) Conserving and Enhancing the Historic Environment

Planning Practice Guidance (PPG) Conserving and Enhancing the Historic Environment was published in April 2014 as a companion to the NPPF, replacing previous Circulars and other supplementary guidance. In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance, and explains how the tests of harm and impact within the NPPF are to be interpreted.

In particular, the PPG includes the following in relation to the evaluation of significance and harm:

“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

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

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.”

1.4.3 Technical Standards and Guidance

Technical guidance produced by Historic England (and its precursor English Heritage) have informed this assessment. Those of most relevance are:

- Historic England 2019. *Statements of Heritage Significance* (HEAN12)
- Historic England 2017 *Good Practice Advice 3 – The Setting of Heritage Assets*, 2nd edition (GPA3)
- Historic England 2018 *Listed Buildings and Curtilage* (HEAN 10)

The key guidance used in this assessment were The Setting of Heritage Assets (GPA3) and Statements of Heritage Significance (HE Advice Note 12).

The Setting of Heritage Assets (GPA3)

This Good Practice Advice Note published in 2017 observes that amongst the Government’s planning objectives for the historic environment is that conservation decisions are based on the nature, extent and level of a heritage asset’s significance and are investigated to a proportionate degree. Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to complex or more straightforward cases:

- Step 1: identify which heritage assets and their settings are affected;
- Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;
- Step 4: explore the way to maximise enhancement and avoid or minimise harm;
- Step 5: make and document the decision and monitor outcomes.

These steps have been followed in the assessment below.

Statements of Heritage Significance (HEAN 12)

HEAN 12 notes that significance is one of the guiding principles running through the historic environment section of the NPPF. The NPPF defines significance as '*the value of a heritage asset to this and future generations because of its heritage interest*'. Such interest may be '*archaeological, architectural, artistic or historic*' and it may derive '*not only from a heritage asset's physical presence, but also from its setting*'. Significance is what conservation sustains, and where appropriate enhances, in managing change to heritage assets.

HEAN 12 sets out three stages that should be followed to provide the planning authority with an understanding of significance of the heritage asset. That understanding:

- must describe significance following appropriate analysis, no matter what the level of significance or the scope of the proposal;
- should be sufficient, though no more, for an understanding of the impact of the proposal on the significance, both positive and negative; and
- sufficient for the LPA to come to a judgment about the level of impact on that significance and therefore on the merits of the proposal.

This approach is embedded into the following assessment.

1.4.4 Local Policy

The Tandridge District Core Strategy was adopted by the Council in October 2008. It sets out key planning policies for the District. The following commentary relates to cultural heritage. There is no specific policy relating to heritage.

16 Heritage

16.1 The District contains a wealth of identified heritage features that contribute to the character, distinctiveness and cultural interest of the area. For full details see the Inventory of Environmental and Heritage Resources. The strategy seeks to preserve, manage and enhance the District's heritage; this includes specifically identified features as well as the wider historic environment.

16.2 Planning Policy Guidance Note 15 "Planning and the Historic Environment"² provides guidance on how development proposals should protect and respect listed buildings.

16.3 The Council has identified other buildings which contribute to the character of the District; these buildings merit retention as part of the character of the area and wider historic environment although they do not qualify as listed buildings. The Council has adopted criteria for assessing whether a building qualifies for inclusion in the Schedule of Buildings of Character.

² Superceded by NPPF

16.4 There are two Historic Parks and Gardens on the English Heritage Register of Parks and Gardens. Surrey County Council working with the Surrey Gardens Trust has identified further historic parks, gardens and designed landscapes of county interest within Tandridge.

16.5 Statutory protection for archaeological and historical sites is accorded to 20 Scheduled Monuments. The relevant legislation is the Ancient Monuments and Archaeological Areas Act 1979 and the relevant guidance is given in Planning Policy Guidance Note PPG15: Planning and the Historic Environment, and PPG16: Archaeology and Planning³. There are also 200 identified Areas of High Archaeological Potential; these are areas where there is good evidence of archaeological deposits.

At the time of writing, the Inspector examining the draft Tandridge Local Plan 'Our Local Plan: 2033' has issued a letter to the Council dated 10th August 2023, following a procedural meeting held on 27th July 2023. Following a three year protracted examination process, the Inspector has acknowledged a number of procedural challenges in progressing the Plan such that it is not possible to make the Plan sound by proposing main modifications to it and will therefore recommend that the Plan is unsound and that it is not adopted. Alternatively, the Inspector has suggested that the Council may wish to withdraw the Local Plan before his recommendation is confirmed within the Inspector's Examination Report. Until the position on the draft Plan is formalised this Report has included draft Local Plan policies, but in the circumstances, limited weight should now be attributed to them. Once the Local Plan has been found unsound / withdrawn, the draft policies referenced will no longer be relevant and carry no weight in the determination process.

The draft policy relating to Heritage states:

TLP43: Historic Environment

To respect the varied historical character and appearance of the District, development proposals will conserve and enhance the character and appearance of designated and non-designated heritage assets, through high-quality sensitive design. These include important archaeology, historic buildings, conservation areas, monuments, street patterns, streetscapes, landscapes, commons, and their settings.

1.4.5 Previous planning application

A previous planning application (TA/2021/1040) included the following reason for refusal.

Reason for refusal 17)

The proposed development would result in less than substantial harm to the heritage significance of St Peter and St Paul's Church, to the Inn on the Pond, to Leather Bottle Cottage and to Charman Cottage, as defined in paragraph 202 of the NPPF. No heritage or public benefits have been demonstrated as part of this application to outweigh such harm. The proposal would therefore be contrary to the provisions Policy DP20 Tandridge District Local Plan: Part 2 - Detailed Policies (2014) and the provisions of the National Planning Policy Framework 2021.

³ Superceded by NPPF

1.5 ASSESSMENT METHODOLOGY AND SIGNIFICANCE CRITERIA

The prediction of effects and the assessment of their significance is based upon the published guidance cited above, measured using the criteria set out in the Design Manual for Roads and Bridges, 2020, LA104 *Environmental Assessment and Monitoring* and professional experience. Although the proposed development is not being assessed under the EIA Regulations, the criteria set out in LA104 are considered the most transparent available for heritage assessments.

1.5.1 Sensitivity

Five categories of sensitivity are identified. These are expanded upon in **Table 1**, below.

Table 1 Sensitivity of receptor

Value (Sensitivity) of receptor/resource	Definition
Very high	Sites and settings of <i>international importance</i> , for example World Heritage Sites.
High	Sites and settings of <i>national importance</i> . Scheduled Monuments. Registered Battlefields. Grade I and Grade II* Listed Buildings and Registered Historic Parks and Gardens. Sites may also be discovered as a result of new research that are also of national importance and are candidates for scheduling.
Medium	Sites and settings of <i>regional importance</i> . Archaeological sites and features that are not considered sufficiently important or well-preserved to be protected as Scheduled Monuments. Grade II Listed Buildings and Grade II Registered Historic Parks and Gardens. Conservation Areas.
Low	Archaeological sites and structures, and other components of the historic environment that contribute to the local landscape. Locally designated assets.
Negligible	Archaeological sites and structures, and other components of the historic environment of very low importance.

1.5.2 *Magnitude*

The magnitude of change to a cultural heritage asset or landscape is considered in terms of its vulnerability, its current condition, and the nature of the impact upon it. Magnitude is assessed as major, moderate, minor, negligible or none and the criteria used in this assessment are set out in **Table 2**, below.

Table 2 **Magnitude of Change**

Magnitude of Impact (change)		Typical Description
Major	Adverse	Loss of resource and/or quality and integrity of resource; severe damage to key characteristics, features or elements.
	Beneficial	Large scale or major improvement of resource quality; extensive restoration; major improvement of attribute quality.
Moderate	Adverse	Loss of resource, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features or elements.
	Beneficial	Benefit to, or addition of, key characteristics, features or elements; improvement of attribute quality.
Minor	Adverse	Some measurable change in attributes, quality or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements
	Beneficial	Minor benefit to, or addition of, one (maybe more) key characteristics, features or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring.
Negligible	Adverse	Very minor loss or detrimental alteration to one or more characteristics, features or elements.
	Beneficial	Very minor benefit to or positive addition of one or more characteristics, features or elements.
No change		No loss or alteration of characteristics, features or elements; no observable impact in either direction.

1.5.3 Assessing significance

The criteria are considered together to reach a conclusion upon the significance of residual effects taking into account any mitigation measures. They may be beneficial or adverse or neutral effects (i.e. no change to the existing situation). In some cases, it may not be possible to quantify the significance of an effect, for example due to a gap in information, and this is noted.

Table 3 presents a matrix of the inter-relationship of environmental value (sensitivity) with magnitude that leads to a conclusion on the significance of an effect.

Table 3 Matrix of Significance

		Baseline Sensitivity				
		Very High	High	Moderate	Low	Very Low
Magnitude of Change	Major Beneficial	Major Beneficial	Major-Moderate Beneficial	Moderate Beneficial	Moderate/Minor Beneficial	Minor Beneficial
	Moderate Beneficial	Major-Moderate Beneficial	Moderate Beneficial	Moderate/Minor Beneficial	Minor Beneficial	Minor/Negligible Beneficial
	Minor Beneficial	Moderate Beneficial	Moderate/Minor Beneficial	Minor Beneficial	Minor/Negligible Beneficial	Negligible
	Neutral	Negligible	Negligible	Negligible	Negligible	Negligible
	Minor Adverse	Moderate Adverse	Moderate/Minor Adverse	Minor Adverse	Minor/Negligible Adverse	Negligible
	Moderate Adverse	Major-Moderate Adverse	Moderate Adverse	Moderate/Minor Adverse	Minor Adverse	Minor/Negligible Adverse
	Major Adverse	Major Adverse	Major-Moderate Adverse	Moderate Adverse	Moderate/Minor Adverse	Minor Adverse

1.5.4 Limitations and Assumptions

The surveys and baseline information were based on a snapshot in time and the information, including that obtained through secondary sources, is assumed correct at that time.

2. Desk-Based Assessment

The Surrey Historic Environment Record (HER) was consulted for a record of cultural heritage assets up to 1km from the PDA.

The Historic England Archive was consulted to verify the locations and status of designated heritage assets. The study area was set at 2km for scheduled monuments and 1km for all other designated assets, except Lower Gatton Park, which although more than 2km from the PDA sits in an elevated position. These study areas were considered appropriate based upon topography, intervening development, and the intrusive effects of the M23 and M25.

2.1 DESIGNATED ASSETS

No designated assets of cultural heritage significance lie within the boundary of the proposed development.

2.1.1 *Scheduled Monuments*

The nearest scheduled monument is Bletchingley Castle (reference 1013374), a ringwork and bailey 1.1km east-south-east of the PDA. The Castle is of national significance and would have been historically prominent in the local landscape. There is no intervisibility with the PDA due to existing development, trees and topography. Furthermore, the M23 motorway separates the Castle from Nutfield village and the PDA to the west. No further assessment was carried out.

The location is shown on **Figure 4**.

2.1.2 *Listed Buildings*

There are twelve Grade II and one Grade II* buildings within 1km of the PDA.

The following five were scoped into assessment. They comprise four Grade II and one Grade II* listed building, and all sit within 250m of the PDA, as summarised in **Table 4** and shown on **Figure 5**.

Table 4 Listed Buildings within 250m

Asset	Ref on Fig 5	Grade	Description
40-44 High Street, Nutfield ID 1029869	1	II	Cottages, formerly House. C17 refaced in C19. Timber framed with rendered stone front on brick plinth, brick dressings. Plain tiled roof with square ridge stack to left. 2 storeys, 5 casement windows across first floor. 3 similar windows under cambered heads to ground floor. Square bay flat roofed plate glass window to right of centre on ground floor. Glazed door to left under cambered head (No. 44) similar door to left of centre (No. 42). Part glazed door to right of centre under cambered head (No. 40) 100m south of PDA.
Queens Head Public House ID 1029869	2	II	Public house, the east wing possibly originally a market hall or a surviving solar wing, the west wing formerly a farmhouse or alehouse. The northern two bays of the east wing have been dendro-dated to 1505 and extended to the south in the C18. The west wing is mainly of mid-C17 date. Later C19 refurbishment and extensions. 150m south of PDA.
Church of St Peter and St Paul ID 1377573	3	II*	Church. C13 with tower rebuilt to top in 1786, restored in 1882. Coursed stone to base of tower, rubblestone above with repairs in brick to top. Rendered and pebble-dashed south aisle and nave with stone dressings. Plain tiled roofs, Horsham slabs to chancel and wooden shingles on spire. Victorian windows. 100m north east of PDA.
Chest tomb in churchyard, St Peter and St Paul Church ID 1280444	4	II	Chest Tomb. Dedicated to John Clement. Died 1741. Brick on stone plinth with inset stone panels to ends and sides. 75m north east of PDA.
Folly Tower 1029868	5	II	Folly Tower in grounds of "Redwood, dated 1858. Coursed stone with brick quoins to angles; stone quoins on lowest stage. Square, 3 stages with rendered dressed stone battlemented parapet to top. 80m south of PDA.

The following listed buildings were scoped out of further assessment, with the rationale noted in **Table 5**. Locations are shown on **Figure 6**.

Table 5 Listed Buildings scoped out of assessment

Address and reference	Ref on Fig 6	Grade	Effect of development upon setting
Nutfield Priory 1400998	1	II	None. Set within own wooded grounds providing complete screening from the PDA at 500m distance.
Halfway House 1029902	2	II	None. 380m east of PDA. Development screened by existing vegetation and separated by other development. Fronts onto A25.
Chilmead Farmhouse 1188302	3	II	None. PDA 850m north west. No intervisibility due to vegetation.
Mill Cottage 1029986	4	II	None. Nearest area of built development 925m south west. No intervisibility due to vegetation.
Charman Cottage 1377598	5	II	None. 840m north west of PDA. Screened by topography and vegetation.
Leather Bottle Cottage 1029874	6	II	None. 850m north west of PDA. Screened by topography and vegetation.
Lancelyn Club (now the Inn on the Pond) 1377597	7	II	None. 790m north west of PDA. Screened by topography and vegetation.
The Glebe House 1280468	8	II	None. Nearest area of built development 523m south west. No intervisibility due to topography.

2.1.3 Conservation Area

One Conservation Area – centred on Pendell Court - lies 1km north east of the PDA, on the eastern side of the M23 motorway. There is no intervisibility.

2.1.4 Other Designated Cultural Heritage Assets

There are no World Heritage Sites, Registered Battlefields or Historic Parks and Gardens within 1km of the Application Area or PDA.

Lower Gatton Park is a grade II registered park and garden that is situated 1.6km north west of the nearest boundary of the application area and more than 2.5km from the PDA.

The registered area comprises 234ha of park and pleasure grounds forming the setting for a country house. Design of the park was by Lancelot (Capability) Brown in the 1760s and 1770s with mid-19th century remodelling around the house. The gardens were further remodelled in the late 19th century by H E Milner, and again during the early 20th century.

In terms of significance, the Park is extensive, but has seen several phases of development and re-modelling, and in recent years some water features have silted up. Approaches have

been modified to accommodate cars. The land to the south east – that is towards the PDA – has become intensively urbanised since 1945.

There may be long distance views to the location of the PDA, but these would be entirely absorbed within a backdrop of development and the development itself would not be discernible. There would therefore be no impact on setting or appreciation of significance.

Figure 7 provides further clarification of the current context of Lower Gatton Park.

2.2 HISTORICAL BACKGROUND

The PDA is within the civil and ecclesiastical parish of Nutfield and within Reigate Hundred, the former sub division of the county. The parish has been noted for the ‘Sandgate Beds’ a source of fuller’s earth and these beds have been extensively worked over several centuries.

In the 19th and 20th centuries the PDA was the property of the Fuller’s Earth Union Ltd, a company formed in 1890 by bringing together a number of small firms who were working fuller’s earth at various sites in Redhill and Nutfield.

In 1954, after being closely associated for several years, the Fuller’s Earth Union Ltd was taken over by Laporte Industries Limited, but continued to be run as a separate company until 1966, and retained a recognisable distinct identity up to its demise in the early 1990s, when the remaining Surrey factories were run down and closed, finally ending in 1997. Laporte itself effectively ceased to exist in 2001, when it was bought out by Degussa, a German firm.

2.3 ARCHAEOLOGY

Large swathes of the application area have experience mineral working, as can be seen on historic maps and aerial photographs. The full suite of Ordnance Survey maps has been examined for this assessment and a search of the Historic England Archive was carried out for aerial photographs. These were examined in their offices in Swindon. The research confirmed that much of the PDA, and up to 85% of the wider application area has been disturbed.

An aerial photograph showing disturbance in the PDA is included at **Figure 8**.

Additional to the actual extraction areas, the peripheral land is also likely to have been disturbed by movement of plant and soil storage.

3. Assessment of Effects

3.1 DIRECT IMPACTS

There will be no direct impact upon any designated or undesignated heritage assets.

Based upon the extent of the previous workings and restoration, it is clear that there is very little or no potential for a direct impact upon archaeology, and this has been scoped out of detailed assessment.

3.2 INDIRECT IMPACTS AND EFFECTS

3.2.1 *Introduction*

Indirect impacts are those that do not physically affect a cultural heritage asset or landscape, but that potentially alter the context or its setting.

As described in **Section 1.4**, Historic England's GPA3, The Setting of Heritage Assets, recommends a broad approach to assessment of setting, undertaken as a series of steps that apply proportionately to complex or more straightforward cases.

Setting is defined in the glossary to the National Planning Policy Framework (NPPF) as:

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of the asset, may affect the ability to appreciate that significance or may be neutral."

GPA3 states that:

"The setting itself is not designated. Every heritage asset, whether designated or not has a setting. Its importance, and therefore the degree of protection it is offered in planning decisions, depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation."

3.2.2 *Identify which heritage assets and their settings are potentially affected (Step 1 – GPA3)*

The following designated heritage assets were scoped into the initial assessment, mainly due to proximity to the PDA, namely.

- 40-44 High Street, Nutfield
- Queens Head Public House
- Church of St Peter and St Paul
- Chest tomb in churchyard, St Peter and St Paul Church
- Folly Tower

3.2.3 Assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s) (Step 2 GPA3)

An assessment was made of their current context and their relationship with the PDA. This is summarised in **Table 6**.

Table 6 **Heritage Assets Scoped into Assessment**

Asset	Ref on Fig 5	Grade	Current context and Change
40-44 High Street, Nutfield	1	II	On the A25 within a context of housing, including modern to rear and to west, 100m south of PDA. No views to PDA predicted due to intervening vegetation. No effect upon our ability to appreciate the significance of the asset or its setting from the proposed development
Queens Head Public House	2	II	On south side of A25, 150m south of PDA. No views to PDA due to modern housing to north (Hunters Gate) and intervening vegetation. No effect upon our ability to appreciate the significance of the asset or its setting from the proposed development
Church of St Peter and St Paul	3	II*	<p>100m north east of PDA. Set within mature trees to the east of Church Lane (Figures 9-13). Because the lane is incised, this gives the impression that the Church is an elevated position. The Church is a significant asset in the local landscape, although largely self-contained within a churchyard surrounded by mature trees including evergreen to the west side.</p> <p>No predicted views at ground level from Church due to woodland and Beechfield Cottage that sits on the west of Church Lane. Possible filtered views through woodland from within the Churchyard that forms the curtilage – see cross-section Figure 3. Views of development likely from parapet of tower though filtered by woodland.</p> <p>Proposed development is within land that has previously been worked for mineral between 1914 and 1949. No surviving historical context between the Church and the PDA.</p> <p>No effect upon our ability to appreciate the significance of the asset or its setting from the proposed development</p>
Chest tomb in churchyard, St Peter and St Paul Church	4	II	<p>75m north east of PDA within churchyard boundaries. Its setting is related directly to the churchyard within which it sits.</p> <p>No effect upon our ability to appreciate the significance of the asset or its setting from the proposed development.</p>
Folly Tower	5	II	<p>90m south of PDA. Set amongst later development and with swimming pool building permitted in 2013, Figure 14. 25m north west of listed building, divorcing the Folly Tower from PDA. Views predicted from top of tower. None at ground level.</p> <p>No effect upon our ability to appreciate the significance of the asset or its setting from the proposed development.</p>

Other factors including noise, disturbance from construction, artificial light intrusion and traffic have been considered in the assessments of other consultants.

3.2.4 Explore ways to maximise enhancement and avoid or minimise harm (GPA Step 4)

The proposed development incorporates enhanced woodland planting along its eastern boundary that will strengthen the existing woodland that separates Church Lane (and the Church) from the PDA. On current information there is no requirement for any mitigation or enhancement other than that incorporated into the proposed development.

3.2.5 Assess the effects of the proposed development, whether beneficial or harmful, on that significance (GPA Step 3)

Although this is an earlier Step in GPA3, it is logical in this assessment to place it after the embedded mitigation, so that the residual effects can then be assessed. The results of the assessment of significance are drawn together in **Table 7**, below, together with the rationale behind the evaluation.

Table 7 Evaluation of residual effects

Direct / Indirect and Scope	Asset	Type of Effect	Probability of Effect Occurring	Sensitivity	Magnitude	Significance of Effect	Rationale
Direct effects Statutorily Protected Heritage Assets	Listed buildings	None	Certain	High	No change	Neutral	There are no listed buildings within the PDA.
	Scheduled Monuments	None	Certain	High	No change	Neutral	The nearest SM sits 1.1km east-south-east
Indirect effects upon setting of designated assets	Scheduled Monuments	None	Certain	High	No change	Neutral	There is no intervisibility with Bletchingley Castle due to development, the M23 motorway, woodland and topography.
	Church of St Peter and St Paul, Grade II*	Adverse	Likely from tower only	High	Negligible	Negligible ⁴ Less than substantial	100m north east of PDA. Screened by existing vegetation and development at ground level. Filtered views through woodland from tower. No effect upon our ability to appreciate significance.
	Folly Tower II	Adverse	Certain from top of tower only	Medium	Negligible	Negligible ⁵ Less than substantial	Screened by existing vegetation at ground level. New swimming pool building dominates immediate setting. No effect upon our ability to appreciate significance.
	Other Grade II Listed Buildings	None	Certain	Medium	No change	Neutral	Screened by existing and proposed vegetation and by development. No effect on setting.
	Lower Gatton Park	None	Certain	Medium	No change	Neutral	A combination of distance (2.5km to PDA), and intervening development and vegetation, will prevent any adverse effects upon setting.

4/5 See Table 3 above (DMRB, 2023)

4. Summary

4.1 DIRECT EFFECTS

There will be no direct effects upon designated or undesignated heritage assets.

Based upon the extent of the previous mineral workings and restoration, it is clear that there is very little or no potential for a direct impact upon archaeology.

4.2 INDIRECT EFFECTS AND MITIGATION

Indirect effects are those that do not physically impact upon a cultural heritage asset or landscape, but that alter the context or setting. They may be beneficial, adverse or neutral (i.e no change to the current situation).

One scheduled monument is situated within 2km, Bletchingley Castle, 1.1km east-south-east of the PDA. There is no intervisibility due to development, the M23 motorway and topography.

Lower Gatton Park is a grade II registered park and garden that is situated 2.5km from the PDA. It is separated from the PDA by extensive industrial and residential development, vegetation and a landscape containing evidence of former quarrying.

The proposed development would have no effects on these assets.

There are twelve Grade II and one Grade II* listed building within 1km of the PDA. Based upon an assessment of topography, screening by existing vegetation, development and the intrusion of the road network (in particular the A25 and M23), many assets were scoped out of assessment.

Five assets were scoped into assessment, mainly due to proximity, at less than 250m from the PDA.

Of these assets The Church of St Peter and St Paul (Grade II*) is predicted to have views from the tower filtered by woodland (both existing and proposed) at a distance of 100m north east of the PDA, but none at ground level from the Church itself. Filtered views may be possible from its curtilage. The effect is predicted to be of negligible magnitude and at the lower end of less than substantial harm.

Folly Tower is a mid-19th century Grade II stone tower set amongst later development, 90m south of the PDA. Views are predicted from the tower of the PDA. The effect is predicted to be of negligible magnitude and at the lower end of less than substantial harm.

No mitigation additional to that proposed is required in relation to the effects upon the setting of designated heritage assets.

The residual effects would have no effect upon our ability to appreciate the significance of designated heritage assets, the test set by NPPF and Historic England.

4.3 CONCLUSION

The proposals will have an adverse effect of negligible magnitude upon St Peter's Church, a Grade II* asset. This effect – the development being visible from the tower of the church – is

considered to be at the lower end of the '*less than substantial*' bar. There would be no views predicted from ground level.

Folly Tower, A Grade II asset would also experience views from the top of the tower. The current context of the Tower has however changed significantly, especially in recent years. This effect is also considered to be at the lower end of '*less than substantial*' harm.

With mitigation in place there are no predicted residual effects of any significance.

Figures



Figure 1 Site Location



Figure 2 The Proposed Masterplan

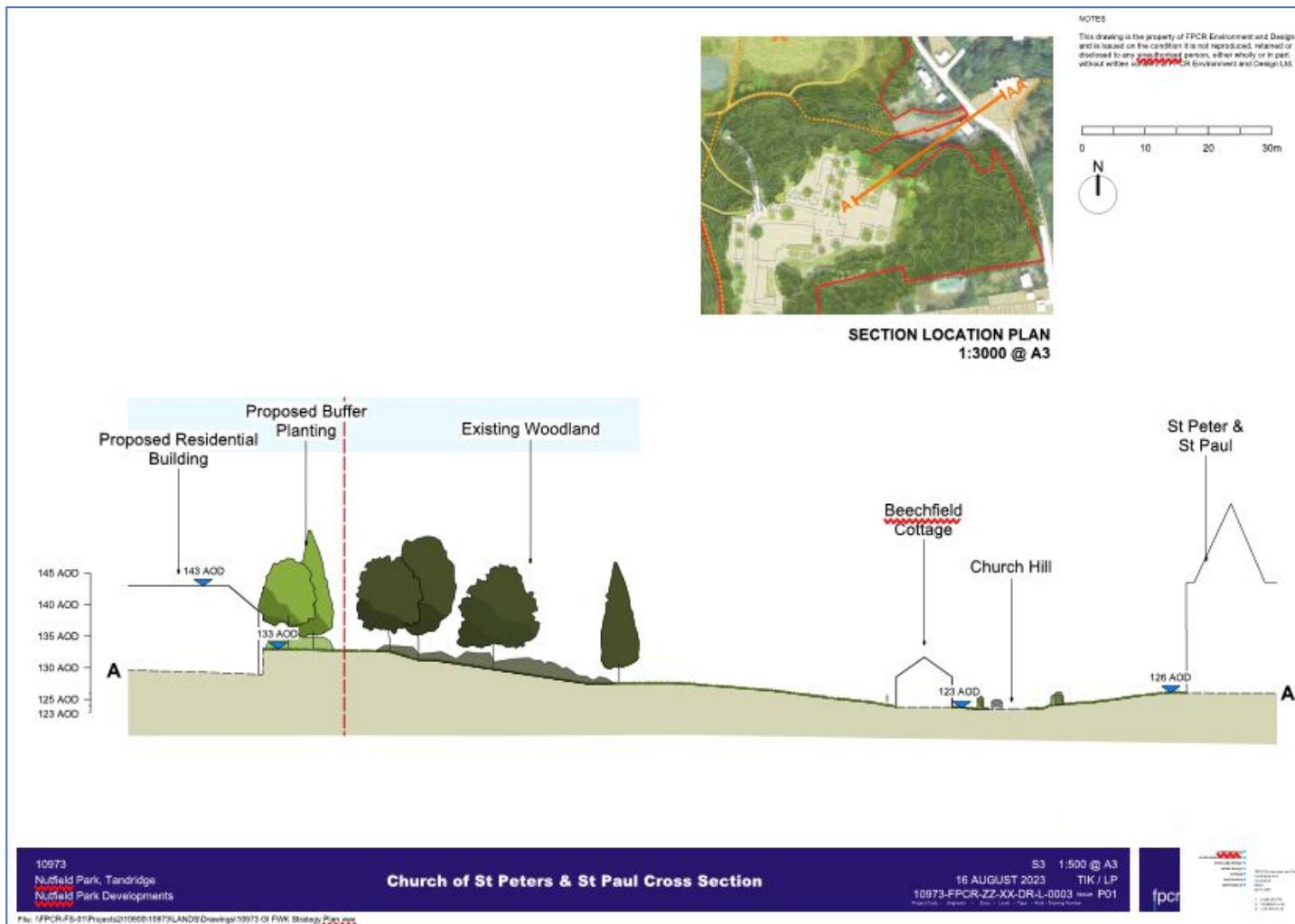


Figure 3 Cross-Section from PDA to The Church of St Peter and St Paul

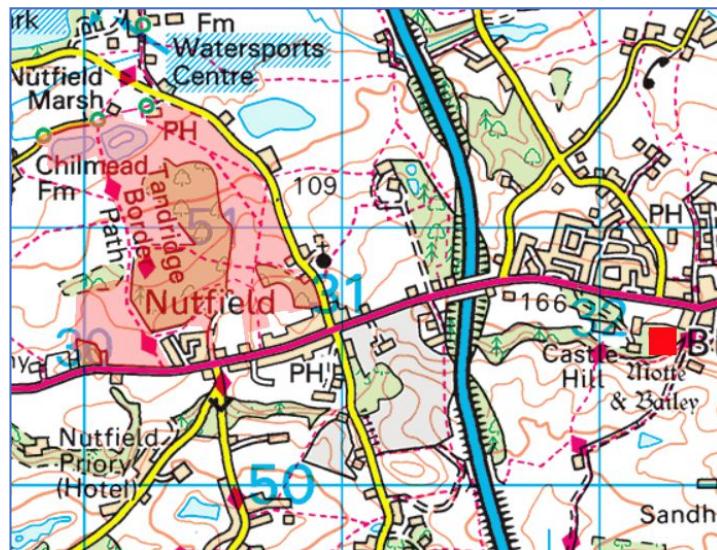


Figure 4 Bletchingley Castle Scheduled Monument, 1.1km ESE of the PDA

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Figure 5 Listed Buildings scoped into Assessment (reference Table 5)



Figure 6 Listed Buildings scoped out of Assessment (reference Table 6)
White shading shows extent of PDA

© Google base photo



Figure 7 Context of Lower Gatton Park and the PDA, 2.5 km south west
White shading shows extent of PDA

© Google base photo



Figure 8 Aerial Photograph looking south east towards PDA, circa 1971
© Nutfield Historical Society.



Figure 9 **The Church of St Peter and St Paul view of trees from Church Lane enclosing churchyard in summer**



Figure 10 **The Church of St Peter and St Paul – winter view, showing evergreens to west (left) © Google**



Figure 11 View from southern porch towards PDA



Figure 12 View from churchyard gate towards PDA



Figure 13

The context of the Church of St Peter and St Paul and the nearest element of the PDA overlain onto Google Earth showing location of Figures 11 and 12. © Google base photo

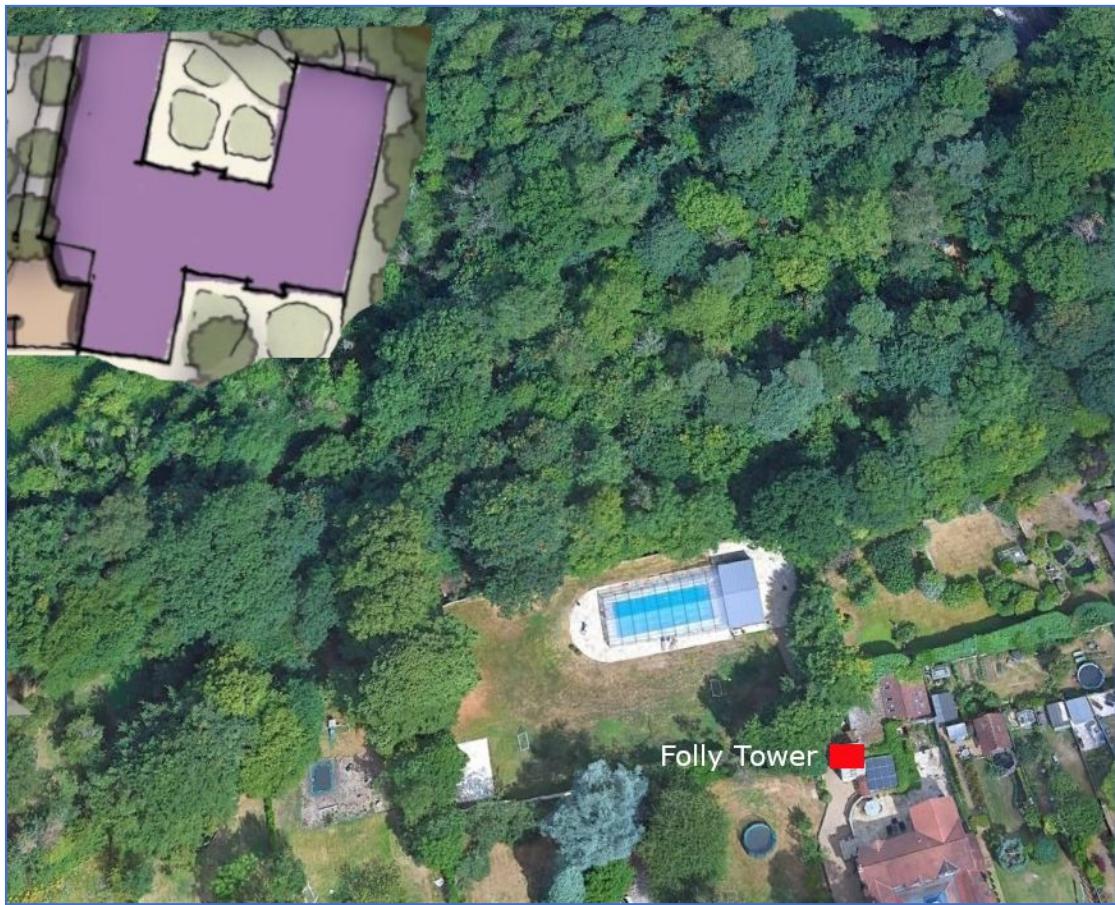


Figure 14 The context of Folly Tower and the nearest element of the PDA overlain onto Google Earth © Google base photo



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