



Mr Cliff Thurlow

Direct Dial: 0207 973 3636

Tandridge District Council

8 Station Road East

Our ref: P01602335

Oxted

Surrey

RH8 0BT

9 January 2026

Dear Mr Thurlow

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

**LAND SOUTH OF BARROW GREEN ROAD OXTED  
Application No. TA/2025/245**

Thank you for your letter of 17 December 2025 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 provided pre-application advice to the applicant on 27 August 2024 but we had not at that time considered some key information including the Heritage Impact Assessment, the EIA's Accurate Visualisations of the Proposed Development, and the Extensive Urban Survey for Oxted.

We were not consulted by the Council when the application for planning permission was being considered but we were consulted about this appeal just before Christmas. However, I'm afraid that the Inspector of Historic Buildings and Areas who visited the application site in 2024 is unwell and has not yet returned to work after the Christmas break. Therefore, while we are pleased to provide some additional advice to help facilitate the Inquiry, we can only provide a desktop assessment of the application



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documents without the benefit of advice from the officer who visited in 2024.

## Summary

St Mary's Church is a medieval church of exceptional interest that is listed at Grade I. Court Farm House is a sixteenth-century farmhouse (on the site of an earlier manor house) that is listed at Grade II.

The proposed development would diminish the potential to appreciate the historic rural setting of the church and Court Farm House, which would be harmful to their heritage significance. We consider that the level of harm is likely to be low on the scale of less than substantial harm.

In determining the application, great weight should be given to the conservation of designated heritage assets irrespective of the level of harm. Any harm to the significance of designated heritage assets would require clear and convincing justification.

Historic England does not object to the proposals but raises concerns about the potential for harm to the heritage significance of the Church in particular.

## Historic England Advice

### Significance

The manor of Oxted has Late Saxon origins. The first church may have been sited where St Mary's now stands but if a village existed at that time its location is unknown. It is possible that there was no village as in the Weald settlements were commonly scattered about the manor. Historic mapping suggests that in the later-medieval period the church and manor were isolated in an agricultural landscape.

St Mary's was founded as a hospital in 1189-99. It has a twelfth-century tower, the chancel and aisles are thirteenth and fourteenth century respectively and the porch is of fifteenth-century date. The old manor house was located on the site of the present Court Farm House (which was begun in the sixteenth-century) adjacent to the church on the best agricultural land in the parish.

The church sits in an elevated churchyard in low-lying surroundings. It dominates the small circular enclave of Court Farm Lane where its elevated position and the extensive verdant screening create a strong sense of intimacy.

The slightly elevated position gives its otherwise rather squat tower a degree of prominence, particularly in views from the south across Master Park and from Church Lane. The escarpment in the middle distance to the north creates a strong sense of





place and enclosure and provides a rural backdrop to the church.

We accept the observation in the Cogent Heritage Proof of Evidence that there are views from the raised churchyard in which the appeal site can clearly be seen as part of the rural context of the church. It says that there is a tangible connection between the medieval church and the countryside and these views and the more general experience of the church within a rural setting helps enable appreciation of the historic rural context of the church and Court Farm House.

The church and the manor house were originally the centre of a rural landscape that was the feudal demesne of the manor. It comprised the land retained and managed by the lord for his own use and support. The proposed development site is the sole remaining area of open countryside that can evoke the demesne that was essential and integral to the manorial centre. Historic maps show that this manorial centre remained isolated from other settlements until the mid-nineteenth century, and since then has gradually become enclosed by railway and village development.

### Impact

We accept the assessment of the Cogent Heritage Proof of Evidence that the development would replace the last adjacent rural remnant of the manorial demesne, meaning that it would no longer be possible to see the rural countryside from the church or see the tower across a field of undeveloped countryside.

However, the contribution that setting makes to the significance of heritage assets does not solely arise from views, but also from less tangible characteristics (The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition), pages 10 and 11).

In this case, although views may only be glimpsed from the church, we think it likely that the development would tend to create awareness of the development's built-form and materials, lighting, activity and noise, and a sense of further enclosure by suburban development. An appreciation of the change of the setting would remain even where it is not visible.

In summary, we think that the proposed development would diminish the potential to appreciate the historic rural setting of the church and Court Farm House, which would be harmful to their heritage significance because the rural setting that was of fundamental importance to their historic purpose.

We consider that the level of harm is likely to be low on the scale of less than substantial harm; however that is, as the Cogent Proof of Evidence says, not because the harm is inconsequential but because the setting makes a small contribution to the





significance of what is a complex and important church.

We note that the Desk Based Assessment says that the proposed development will also cause some harm to archaeological remains on the site but we do not intend to comment about the effects of development on undesignated archaeological remains, which are overseen by Local Authority archaeological advisors.

We do not think this proposal would provide any heritage benefits, but we acknowledge that there will be public benefits of other sorts in providing new housing and public facilities.

### Policy

In formulating our advice, we have assessed the proposals against the National Planning Policy Framework, which sets out the Government's policies for decision-making on planning proposals.

Paragraph 212 says that 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.

Paragraph 213 requires clear and convincing justification for any harm or loss to a designated heritage asset's significance.

Where harm is less than substantial, paragraph 215 requires it to be weighed against the proposal's public benefits.

### Position

We acknowledge that the applicant seems to have addressed the recommendations that we made in our initial pre-application advice in 2024. However, we think that despite this there would be some residual harm diminishing the potential to appreciate the historic rural setting of the church and Court Farm House, which would be harmful to their heritage significance.

We consider that the level of harm is likely to be low on the scale of less than substantial harm; however this is not because the harm is inconsequential but because the setting makes a small contribution to the significance of a complex and important church.

When assessing the proposal, the benefits and harm of the proposals should be



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weighed up. In doing so great weight should be given to the conservation of designated heritage assets irrespective of the level of harm (para. 212). Any harm to the significance of designated heritage assets would require clear and convincing justification (para. 213).

We acknowledge that the development might have some public benefits and that clear and convincing justification for development might be present if the public benefits of the proposal outweigh the harm to designated heritage assets (para.215).

Historic England does not object to the proposals, but we raise concerns about the potential for harm to the heritage significance of the Church in particular. We emphasise that in weighing the harm to the church and Court Farm House against any public benefits of the proposal, great weight should be given to the conservation of the designated heritage assets.

### **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 212, 213 and 215 of the NPPF.

Consideration should be given to 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.

Yours sincerely

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