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To: SCC Heritage Historic
Environment Officer

From: Executive Head of Service

Date: 02/12/2025

Case Officer: Sherelle Munnis

The following planning application has been submitted which may affect land or property in which you have an interest.

Application No. MO/2025/02695

Description Hybrid planning application for:
Swan Centre: Full details for proposed works to the Swan Shopping Centre including demolition of Leret House, reconfiguration of Units 1-4, Units 21-25 and 21 High Street to provide new commercial floorspace (flexible Class E/sui generis (drinking establishments)), cinema (sui generis) and new shopfronts and associated works.
Bull Hill: Demolition of existing buildings. Full details of Access, western access road and associated highways works and 'Phase 1' comprising 276 residential dwellings (Class C3) in Blocks A-F and ground floor commercial/community floorspace (flexible Class E/Class F2) and associated works. All other matters reserved (Appearance, Landscaping, Layout and Scale) for residential dwellings (Class C3), commercial floorspace (Class E), multi-storey car parking, public park, play space and associated landscaping, parking and amenity and associated works. An Environmental Statement has been submitted in support of the application which, alongside the Swan Centre proposals, assesses the environmental effects of an illustrative masterplan for the proposed development at Bull Hill showing a total of 480 dwellings (including the detailed area), commercial floorspace (Class E) and multi-storey car parking in buildings of between 3 and 12 storeys in height, public park, play space and associated landscaping, parking and amenity space.

Location LAND AT BULL HILL AND SWAN SHOPPING CENTRE
LEATHERHEAD

I shall be pleased to receive your observations on the application within 35 days of the date of this letter. Should I not receive a reply from you by then I will assume you have no observations to make. The application documents can be found here.

<https://molevalley-publicportal.statmap.co.uk/horizoNext/publicportal/planningapplications/129376>

Please send you comments directly to **planningconsultations@molevalley.gov.uk** Yours

faithfully,

A handwritten signature in black ink, appearing to read 'P. Mason', written in a cursive style.

Piers Mason
Executive Head of Service

Grade: ADJ. II and II*

Conservation Area: YES

Advice

No harm []

Substantial harm []

Less than substantial harm[x]

Approve without Conditions []

Approve with Conditions []

Objection/Refusal [x]

HEO 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 must 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.

Please note: Only the works to the Swan Centre are subject to s.72 of the aforementioned act. While the test in terms of policy remains the same, the proposals for Bull Hill are not covered by legislation as the land is not within a conservation area.

The applicant has provided a heritage statement in line with paragraph 207 of the National Planning Policy Framework as well as further documentation to assess the impact of this scheme. While I do not agree with all of the conclusions, I am content this is sufficient to meet the requirements set out by the NPPF.

Further to my comments from the 3rd February 2026, I have provided a further assessment of the impact of the scheme on the heritage assets affected by the proposals.

Significance of Leatherhead Conservation Area

Leatherhead is an important historic settlement in Surrey which was considered a seat of local government in the Anglo-Saxon period. The earliest surviving building is the late 12th century Church of St Mary and St Nicholas (Grade II*). The present town is believed to date to the 13th century when a new, possibly planned, town was set out at the crossroads of Bridge Street, High Street, North Street and Church Street. A market was granted in 1248 and this likely took place at the crossroads. A small number of buildings survive from this period including the Grade II* Running Horses Public House which is listed as dating to the later 15th century.

Despite the decline of the market in the 16th century, there was modest growth in Leatherhead during the 18th century, likely as a result of the turnpike road from London to Guildford. This is reflected in the reconstruction of the Grade II listed

bridge in 1784 by surveyor George Gwilt. Gwilt also produced a map of Leatherhead at this time which shows development was at a relatively low density for a town. To the north of the town remained areas of common waste land which influenced the location and form of dwellings such as the early 18th century Cottage (Grade II) and 16 and 18 Gravel Hill (Grade II).

In 1809 Manning and Bray described the settlement as follows:

The village consists of four streets intersecting in the center [sic], containing several large and good houses. From the opposite hill in the road from Guildford, the church with its lofty tower rising above the houses, and with the buildings appearing interspersed in a rich wood of trees, form one of those striking landscapes which all travellers of taste view with delight.

While the settlement has changed in the last two centuries, there remain picturesque views of the settlement from areas such as Norbury Park with the church remaining a landmark feature. This is reflected in the Taller Buildings Study and is evident in AVR 3.

During the 19th century development increased, particularly after the construction of the current Leatherhead Station (Grade II) in 1867. This saw the infilling of much of the High Street and the loss of the greens and wasteland marked on Gwilt's map. During this period the Bull Hill aspect of the application site was gradually transformed from farmland into gardens and meadowland for a large house and an inn. It later became a public recreation ground and space for offices. It has never formed an important part of the historic built environment of Leatherhead.

By the end of the 19th century, Leatherhead had taken on much of the form it has today, including the housing in the Church Road and Fairfield character areas. The War Memorial (Grade II) were erected in 1921 on North Street. Opposite the application site, Wesley House (Grade II), the Leatherhead Urban District Council offices, was built in 1935 at the junction of North Street and Bull Hill. Redevelopment of The Swan Centre in the late 20th century further influenced the character of the area.

There is a detailed conservation area appraisal of Leatherhead from 2010. The appraisal sets out that there are areas of intimate and small-scale townscape adjacent to much larger developments. Despite these modern elements, the appraisal notes that the townscape of the historic core remains one of the key positive characteristics of the conservation area. This is largely defined by a mix of two and three storey buildings which create a sense of enclosure. At the junction of Bridge Street, High Street, North Street and Church Street the quality of the buildings makes an important contribution to the character and appearance of the historic core. The appraisal further notes that the quality of the townscape at Gravel

Hill is also highly important to understanding the character and appearance of the area through key aspects including the scale, use of materials and building line.

In addition to the immediate townscape character, the long distance views of Leatherhead to the west are also important. The appraisal states that the views of the town are dominated by the stone tower of the Church of St Mary and St Nicholas which makes a very positive contribution to the skyline of Leatherhead, similar to the description set out by Manning and Bray in 1809.

The significance of Leatherhead Conservation Area is as a historic administrative centre set out as a market town in the 13th century around the crossroads of High Street, Bridge Street, Church Street and North Street. The town developed gradually with significant buildings surviving from the 16th to 18th centuries. More rapid development occurred following the arrival of the railway in the 19th century. The architectural interest of the town lies in its high townscape character and good quality urban grain evident from the mix of two to three storey buildings with traditional features, materials and forms which define the town centre.

In terms of the application, the Swan Centre site is in a sensitive location in the historic core of the conservation area. The scale of the building, its use of materials and its location all contribute to the character and appearance of the area by reinforcing important elements of townscape including the enclosure of the High Street. However, its angled arrangement, stepped form and ribbon windows contrast with much of their surroundings. On the whole, I consider the building to make a neutral contribution to the conservation area and surrounding listed buildings. I do not consider it to cause harm, but support its redevelopment for opportunities to improve commercial activity in the area.

Bull Hill is not included in the conservation area. Prior to the arrival of the railways, the site was open farmland and subsequently a set of gardens for a large house. It reveals very little about the significance of the conservation area aside from forming the edge of the town evident in its openness. It is noted as appearing in a key view from the junction of the four main roads in Leatherhead.

Impact of the Swan Centre on Leatherhead Conservation Area

I continue to have few concerns about the redevelopment of the Swan Centre. I do not consider the increase in scale of the building or the opening up of its entrance to result in harm. I note the previous comments by Design South-East regarding the orthogonal form of the building and the slightly awkward relationship this will have with No. 21 High Street, but I do not consider such a relationship to be so out of character that it would cause harm to the conservation area. On the whole, there will be a modest benefit to the conservation area from the increased activity on the High Street from the redevelopment of this site and through the sensitive design of the entrance. I do not consider there is any impact on the listed buildings.

The above assessment is on the basis that the AVRs provided are accurate, in particular view 33 which does not appear to show the cinema auditorium being visible above the roofscape. I would suggest you check this with the applicant before determination to make sure the AVR has captured this. If the AVR is accurate and it is not visible from the vantage point shown, I suspect there may still be glimpsed views of the structure, but not to such a degree which could harm the conservation area.

I have reviewed the details of the Swan Centre. I would suggest a condition is applied for the external materials, in particular the brick and metal screening. I consider the proposed use of stretcher bond to be a little disappointing, but the varied nature of the brick should help to add interest. I would welcome joinery details being provided owing to the scale of the scheme.

The entrance on the High Street has internally lit signage for the cinema which is not in line with our shopfront guidance. If you are to approve this then there needs to be a clear rationale which sets out why we are able to deviate from our guidance in this location and to ensure it does not set a precedent. For clarity, I am not insisting that the signage is externally illuminated, but instead asking for sufficient justification for deviating from guidance with the officer report. If there is no justification, then the signage needs to be externally illuminated. I have no concerns with the changes in the style of shopfronts as these are within a shopping centre not on the High Street.

I would welcome an opportunity to review the proposed street furniture in The Swan Centre. I have long considered the granite stools at the west end of the High Street to look out of place and note the inconsistency of street furniture is also raised in the conservation area appraisal. As such, I have some hesitation about a granite bench sitting outside the Swan Centre as it may look lost in the streetscape. I have similar concerns about the quality of the cycle stands and bins which are somewhat underwhelming. If you are still reviewing the scheme with Design South-East it may be worth asking them for suggestions on anything which could further lift the quality of the scheme. I am keen for this not to be a lost opportunity.

Impact of Bull Hill on Leatherhead Conservation Area

I have been to several meetings about the redevelopment of this site and the aspiration to transform Leatherhead. I remain supportive of the scheme in principle as it presents a good opportunity to build housing in a sustainable location while also bringing economic benefits to the town. Since my first involvement, the scheme has started to move in the right direction with the taller buildings located away from the conservation area and a much stronger design ethos to blocks facing Bull Hill (A-E). It should also be noted that the redevelopment of the site would not lead to the loss of any key elements which inform the significance of the conservation area.

Having said this, I still have some quite serious concerns about the principle of the scheme and the impact on setting of heritage assets. In some cases, I consider the harm is inevitable, but in others we have a duty to try and avoid this where possible. I have set out my thoughts on this scheme below. I do need stress that these comments only deal with the impact on the historic built environment. The omission of a feature of the site is not a reflection that it is necessarily acceptable in terms of design or character and appearance.

My greatest concerns relate to blocks G and H and the office block which are up 10-12 storeys. The applicants have provided a Taller Buildings Study to justify this in line with the Local Plan allocation. There is some useful analysis in this document, in particular showing that the best location for the taller blocks is by the railway line owing to the topography of the site. However, I consider some of the conclusions to be flawed which means the scale proposed for these buildings remains inappropriate.

The first issue with the document is that the long-distance views fail to account for the prominence of the church tower and the importance this has for understanding the conservation area. This is not considered a 'heritage' view, despite the fact it is set out as an important consideration within the conservation area appraisal. As shown in AVR 3, the scale and massing challenge the dominance of the church tower over the settlement. The analysis provided in the Taller Buildings Study has inflated the potential scale of Blocks G and H by failing to recognise the impact this has on the prominence of the church tower over the settlement. Ultimately, this harms the conservation area.

The Taller Building Study omits views 10 and 24 from the 'heritage' considerations. While both Leatherhead Bridge and Leatherhead Station are not within the conservation area, both are views from listed buildings where there is clearly a considerable impact. The significance of these assets should be an important influencing factor on the development.

The final issue I have comes down to the volumetric testing. Again, there is some very useful analysis here, particularly for blocks A-E. However, for blocks G and H the results are skewed by the data provided as the only considerations are blocks of 6, 10, 14 or 18 storeys. As a result, the scales chosen are quite arbitrary and do not reflect the data. This is particularly the case for views 24 (Leatherhead Station) and 26 (The Running Horses) where 14 storeys are shown as potentially being acceptable, despite this not reflecting the data provided. This is evident in the AVRs provided as part of the Appendix which show 12 storeys. A modest reduction in scale would result in a more acceptable conclusion here.

The same issue also occurs in view 8 where a 6-storey townhouse is shown. In the first place, I consider a 6-storey building in this location to be inappropriate. While I am pleased that the applicants have agreed and proposed a building up to 5 storeys (see below comments) unfortunately the 6-storey model obscures the 10 and 14 storeys buildings shown which are similarly inappropriate. This downplays the impact of these structures which is exposed within the AVR. I do not agree with the conclusions in the heritage statement that the split between Gravel Hill and North Street diminishes the impact on the conservation area. The towers will be stark and overbearing on this viewpoint.

My only other concern relates to viewpoint 9. When I was asked about this in July last year my advice was it should be taken from the top of the railings at the junction with Church Street, not at the lower vantage point because you would not be able to see anything. The end result is the study suggests we will not see the proposals from the junction. I remain of the opinion that we will see the taller buildings owing to the scale of blocks G and H.

Taking all the above matters together, I do not consider the Taller Building Study provides the justification required by the Local Plan allocation or by paragraph 213 of the NPPF. The document fails to take into consideration the importance of long views for understanding the conservation area, it does not consider some of the views to be important for understanding the historic built environment, the scales chosen arbitrary and some of the evidence is presented in a way which does not show the full impact of the submitted scheme.

While the design of blocks G and H and office block is a reserved matter, the details provided in the AVR study show these will have an overbearing and alien character which will dominate their surroundings. These blocks will be highly prominent in many vantage points throughout the conservation area and will seriously detract from the overall historic townscape character. While I accept that conservation is about the process of managing change and not preventing it, these blocks will not nestle in behind the existing townscape, but appear as stark and overbearing intrusions which will cause serious harm to Leatherhead as a historic market town. As shown in the AVR, this will be evident in key vantage points within

and of the conservation area including viewpoints 3, 7, 8, 10 and 24. I also consider the development to have a harmful impact from junction of North Street, High Street, Bridge Street and Church Street, although this is not shown in the AVR. Ultimately, this will harm the ability to understand Leatherhead as a historic market town and its skyline which has been dominated by the church for the past eight centuries. Such an impact is quite serious and as an authority we should be seeking to reduce this harm.

I am more content with blocks A-E. While these are large structures and will impact the setting of some of the listed buildings (see below), they will largely be invisible from key vantage points within the conservation area and will make use of materials which reflect the history of Leatherhead. As with the Swan Centre, I would strongly encourage a condition on materials to maintain the quality of the proposals. I would also be keen to have typical details of the window joinery, particularly a RAL colour so we can understand how these will appear.

I consider there will be some harm to the conservation area from blocks A-E, particularly in vantage points from Gravel Hill. This is specifically from the reduction in openness which reveals the edge of Leatherhead's historic development. Such an impact is low as I consider the applicants have done everything they can to reduce this. I also consider there is a suitable justification based on the Taller Building Study. Nonetheless, this will need to be taken into account as part of the overall impact of the scheme. I do not have any concerns about the views out of the Fairfield character area as any impact will only be experienced in areas defined by modern housing.

I am a little disappointed in the ancillary blocks attached to B and D which could have been better incorporated into the scheme. Ultimately, these will stick out the side of the buildings awkwardly and you may wish to raise these with Design South-East. Having said this, I do not consider the blocks to cause harm to the significance of the conservation area. I would encourage you to check with the applicant that all the plant machinery on the top of the buildings is correctly shown.

I consider it is something of a disappointment that the space between blocks C and D is being entirely enclosed for private use. This is not what is shown in the Design and Access statement in viewpoint 2. I suspect this is security for residents rather than providing a meaningful garden. It would be better for the development if more of this space could be included in the public realm as shown in the visualisations. Having said this, it is not really a heritage matter, so I leave it up to you whether this is worth raising. It would just seem to be a bit of a missed opportunity. I note the Design Code shows tarmac as a reserved matter for the paths in the Bull Hill development. I would check whether a buff coloured tarmac is achievable as shown in the visualisations.

I have reservations about the scale of Block F which would be much better if some of its additional floors could be added to Block E so it does not have such a significant contrast. However, as this is not a heritage matter, I do not consider it part of my objection.

I am supportive of the location of the town houses which is in one of the more sensitive locations within the Bull Hill site. This is recognised in Design Code which notes the importance of the south-east aspect. My only concern is the scale which seems to vary between 3 and 4 storeys depending on which document you are assessing. My own understanding of the parameter plan is that they could be up to 5 storeys (provided the plant is included). There is a danger that unless this is properly addressed in the Design Code the buildings could present as a solid block which has an overbearing impact on the view from North Street.

As a way forward, I suggest that the Design Code incorporates a traditional articulated roof form (but not necessarily fully pitched) at the south-east corner of the site. In essence, the town houses should avoid having a flat parapet and should have some visual interest as shown in the visualisations. I am happy to discuss this further should you wish to get some feedback from Design South-East. The town house at the south-east corner really does need to be of an excellent quality. I am concerned we are not quite there with this aspect of the scheme yet.

At present, this scheme will overall result in a high degree of less than substantial harm to Leatherhead Conservation Area. This is from the scale of the proposed tower blocks which will have an overbearing and dominating impact on the Leatherhead Conservation Area. The alien presence of these blocks will form a stark and unwelcome contrast with the immediate high-quality townscape of the area and in the wider views from Norbury Park. It is a requirement for this impact to be justified both in terms of paragraph 213 of the NPPF and the Local Plan allocation. I do not consider the Taller Buildings Study provides this justification. I do not consider that this matter could be improved at reserved matters unless the parameters of the scheme are changed.

Owing to the great weight which must be applied there are solid grounds to refuse the scheme. Many of these issues could be resolved with a modest reduction in scale. While the blocks would still be seen in many vantage points around Leatherhead, they would not have as stark a contrast with either the historic townscape or the long-term views. I remain quite content that this is the correct location for the taller buildings, but the applicants need to look again about the proposed scale.

Listed Buildings

There is no direct impact on any listed buildings from the scheme. In terms of an indirect impact through setting, the scheme will be seen from numerous listed buildings around the development sites. In this instance, the consideration is how the development will affect the significance of these assets, not whether they can be seen or experienced in their context.

I do not consider there is harm to any listed buildings from the proposed redevelopment of the Swan Centre. This includes the Grade II 10 and 12 High Street opposite the application site. I do not consider the scheme represents a benefit to this building.

In terms of the Bull Hill redevelopment, the scheme will be seen in the context of several listed buildings. I have reviewed these below.

The Grade II* listed Church of St Mary and St Nicholas is a prominent feature on the Leatherhead skyline. The tower dates to the 15th century and the spire is an 18th century replacement. The building is significant as an early surviving building in Leatherhead which reveals how residents have worshipped for the past eight centuries. The building draws significance from its prominence in long views.

I consider there is a moderate level of less than substantial harm from the scheme owing to the scale of the proposed development which will challenge the prominence of the church tower. With a more reasonable scale, I consider this harm could be reduced.

The Running Horses (Grade II*). The significance of the building stems from its status as a vernacular building which provides important evidence for the development of Leatherhead as a market town. This is evident in its form, scale and materials. In terms of its setting, views of the building from the south allow it to be appreciated in the context of buildings of a similar (but not the same) scale providing it with a sympathetic townscape setting.

The proposed scheme will result in harm to the setting of the building owing to the scale of the blocks G and H which will be prominent in views of the building. The blocks will have an overbearing impact harming the historic character which informs the significance of the building as an early surviving vernacular building. This is evident in AVR 26. While I agree with the consultant that the importance of such views are limited by the approved Clare House and James House scheme, nonetheless there is an impact which must be taken into account. I consider there is a low level of harm to the significance of the building. With a more sensitive scale, this harm could be avoided.

To the south of The Running Horses is the Grade II Leatherhead Bridge, completed in 1784. This is an important aspect of the town's history representing its growth

toward the end of the 18th century as a result of the turnpikes. The significance of the building stems from its status as a late 18th century bridge evident in aspects such as its form and materials. The building also draws significance from its setting where it marks a point of arrival into Leatherhead. At present, this is evident in the relatively low-rise form of the many of the buildings on Bridge Street along with the use of traditional materials and forms. However, this will change as part of recently approved scheme for Clare House and James House which is for a part 5 storey building.

As with The Running Horses, blocks G and H will appear in views of Leatherhead from the bridge as shown in AVR 10. While the harmful impact of these buildings is tempered by Clare House and James House nonetheless the towers will appear out of context forming an alien feature on the skyline. There is harm from this, albeit to the lower level of harm. With a more sensitive scale, this harm could be avoided.

Leatherhead War Memorial (Grade II) on North Street is a Grade II listed structure dating from 1921 which is designed to commemorate those who lost their lives in the First World War. The listed building is of a sympathetic scale and design to its surroundings evident in aspects such as its pitched roof, use of flint and modest scale. The significance of the building stems from its status as a well-designed commemoration of those who lost their lives in conflict. The building draws significance from its surroundings which demonstrate that it is a carefully considered element of townscape. Its immediate context is important in revealing its design quality.

The proposed scale of the tower blocks G and H will appear as an alien feature in views of this structure along North Street. While the impact will be somewhat tempered by the topography and proposed town houses, I consider there is a moderate degree of less than substantial harm. As with the aforementioned assets this harm could be reduced with a more reasonable scale which would prevent the tower blocks from appear so alien.

To the north-west of the application site is the Grade II listed Leatherhead Station, designed by C H Driver and completed in 1867. The building was completed in a grand Neo-Romanesque design featuring aspects such as polychromatic brickwork and features a tower with a pyramidal roof. The building is designed to give the impression of a grand and imposing station representing the status of the London, Brighton and South Coast Railway Company. In Leatherhead this was important owing to the rival London and South Western Railway station nearby. The significance of the station can be summarised as a grand and imposing Victorian railway station designed a notable architect. Aspects which reveal its significance include its form, scale, use of materials and use of the different features.

In terms of setting, I do not consider the railway station draws much from the application site or its relationship with Leatherhead Conservation Area. However, the grandeur of the station building is a key aspect which is evident in views of the building. As shown in AVR 24, the proposed blocks will challenge this as a result of their scale. Owing to their proximity, such harm represents a moderate level of less than substantial harm. As with some of the aforementioned assets, I consider such harm could be reduced with a development on a more reasonable scale.

Adjacent to the site is the Grade II listed The Cottage which is an early 18th century wayside cottage. Wayside cottages were built on the edge of wasteland or common land and were often occupied by labourers or other who made use of common land. The building is significant as an early surviving wayside cottage built at the edge of Leatherhead. Key aspects include its form, scale and use of construction techniques. Importantly, the building also draws significance owing to the open nature of its surroundings which reveal it was built on the edge of Leatherhead.

I consider there is overall a low degree of less than substantial harm to this building owing to the presence of blocks A-E. These will reduce the open space opposite the building while also having an overbearing impact on its immediate surroundings due to the scale of the units. However, I also agree that the public realm improvements will also provide a tidier and more welcome setting as opposed to the car parking currently now opposite the building. The introduction of more greenery opposite the building and the removal of the brick boundary wall will have a beneficial impact which again I have taken into consideration. In contrast to the impact from blocks G and H, I consider the impact here to be much better justified as a result of a sympathetic design (and scale) which allows housing to come forward on the site. I do not consider there is anything further which could be done with the impact on this building if Bull Hill is to fulfil some of its housing allocation.

I have also looked at the impact on 16 and 18 Gravel Hill which will be seen in views of the development. The buildings date from the end of the 18th century (1799) and consist of development at the edge of the settlement of Leatherhead. They are significant as examples of late 18th century dwellings built as part of the gradual evolution of Leatherhead. The buildings draw interest from their form, scale, materials and apertures for fenestration which reveal their significance as late 18th century buildings. They also draw interest from the open character of the application site which provides context for the abrupt end to the street which at the time was the edge of the settlement.

Blocks A-E will be seen from the end of the street and will appear in peripheral views of the listed buildings. There is a tree at the end of the street which blocks some of these views in summer, but not in winter. It is poor practice to rely on the survival of a tree in assessing a scheme. Owing to the loss of openness which reveals the nature of the buildings at the edge of the settlement, but taking into account the aforementioned points, I consider there is a low degree of harm from

the scheme. Such harm is justified by the Taller Buildings Study as great care has been taken to ensure the scheme is of a reasonable scale.

With regard to Wesley House (formerly the Leatherhead Council Offices), the building draws significance from its impressive Neo-Georgian façade as well as the interiors of the building. The principal façade faces south-west from where it is intended to be appreciate as a grand and impressive building. To the rear are modern, but well designed, extensions. Unlike 16 and 18 Gravel Hill, the building draws no significance from the application site as its openness reveals nothing about the construction of the building. The key consideration is how views of the principal façade are appreciated in this instance.

The main impact on this building will be from its appearance in oblique views of its façade facing toward the development site. This view is shown in AVR 11. The new dwellings will reduce the dominance of the building in its surroundings which will result in harm as its grand appearance which will be diminished as a result of surrounding built form. However, the main viewpoint where the principal façade is meant to be appreciated will be preserved (south-west). As such, overall I consider the harm to this building to be low. Such harm is justified by the Taller Buildings Study.

Reviewing these altogether, I have found the following level of harm:

Listed Building	Grade	Level of Less than Substantial Harm	Justified
Church of St Mary and St Nicholas	II*	Moderate	Not justified
The Running Horses	II*	Low	Not justified
Leatherhead Bridge	II	Low	Not justified
Leatherhead War Memorial	II	Moderate	Not justified
Leatherhead Station	II	Moderate	Not justified
The Cottage	II	Low	Justified
16 and 18 Gravel Hill	II	Low	Justified
Wesley House	II	Low	Justified

Except for the impact on The Cottage, 16 and 18 Gravel Hill and Wesley House, this harm is because of the overbearing character of blocks G and H which appear as alien features in the setting of many of these listed buildings. In all these cases I have found such harm to be unjustified based on the Taller Buildings Study. While some of this harm may only be low or moderate, it nonetheless must have great weight applied and even greater weight for the Grade II* listed buildings. This may be used as grounds for refusal.

With regard to The Cottage, 16-18 Gravel Hill and Wesley House, I have found there is overall a low level of less than substantial harm to this building from the impact of Blocks A-E. I consider such harm to be fully justified and while it will need to be taken into account as part of an overall planning balance, I do not consider there is anything which could be done to reduce this harm further.

Conclusions

At present, I am unable to support this scheme. Owing to the overdevelopment of the site, blocks G and H have an unacceptable impact on the setting of Leatherhead Conservation Area, the Church of St Mary and St Nicholas, Leatherhead Bridge, The Running Horses, Leatherhead War Memorial and Leatherhead Railway station. This is specifically from the stark and alien appearance of the towers as a result of their scale which will have an overbearing and dominating impact over the conservation area and numerous listed buildings. This will result in a high degree of less than substantial harm to the character of Leatherhead Conservation Area as a historic market town which will in turn affect the significance of many of the above listed buildings. The scheme will also reduce the dominance of Leatherhead Railway Station and the ability to appreciate its grandeur.

This is a great deal of unjustified harm to multiple heritage assets. While paragraph 202 of the NPPF is not a freestanding test, it is clear that the aspirations of this project fail conserve the conservation area and the relevant listed buildings in a manner which is appropriate to their significance. Until this is resolved, I cannot support the scheme and must object in the strongest terms possible. I would be grateful if you could feed this back to the applicants, along with my other advice, and encourage them to look again at the scheme. I remain of the opinion that with a modest reduction in the scale of blocks G and H there would be a significant improvement in the scheme.

Should no changes be made to the scheme, you will need to weigh the benefits of the proposal against the overall harm including improvements to the Swan Centre under paragraph 215 of the NPPF. Great weight must be applied to the harm to the heritage assets as set out above and even greater weight to those listed at Grade II*. At present, I am content there are grounds to refuse the application based on the impact on of the historic built environment.

Notes to Planner

I have not included conditions at this stage, but am happy to be involved in phrasing these if necessary. I would be grateful if you could consider the following.

Swan Centre

- Is the cinema auditorium definitely captured on the AVR? I am surprised it is not visible on AVR 33.
- Are we able to support internally illuminated signage in this location? If so, what is the justification?
- Are granite benches, stainless steel bicycle stands and stainless steel bins the most appropriate street furniture here?
- Are we going to condition the design of the shopfronts?

Bull Hill

- The applicants need to look at reducing the scale of blocks G and H to make this scheme acceptable in heritage terms. I would support a reduction in the scale of block F.
- Is all the plant machinery on blocks A-E shown?
- Could the space between blocks C and D could be incorporated into the park? Does it all need to be private amenity space?
- If possible, I would ask Design South East their views on the ancillary blocks as these do not seem to be well incorporated into the development.
- Does the design code permit buff coloured footways as shown in the visualisations? Or is it too restrictive?
- I would much rather see some articulation in the roof form of the town houses if they are proposed at the current scale. I am happy to negotiate on this matter, but we need to form a resolution which does not result in an overbearing block at the terminus of North Street.

Signed: Chris Reynolds

Date: 06/03/2026

File Ref: 32/8/Gen