

HANDFORTH

HERITAGE

Land East of Oxhey Lane, Carpenders Park
Heritage Impact Assessment

March 2025

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1. Introduction

This Heritage Impact Assessment ('report') has been produced by Steven Handforth, IHBC of Handforth Heritage to accompany an outline planning application for the construction of up to 257 homes, housing with care and a children's home to the east of Oxhey Lane, Carpenders Park. The site consists of several parcels of open field on gently sloping land.

In respect to heritage, the site does not contain any statutorily or locally listed structures. There are several heritage assets in the wider area approximately 700 metres plus, distance away. Carpenders Park has no conservation area, and the closest is the 'Brookshill Drive and Grimsdyke Estate' Conservation Area within Harrow, approximately 900m to the southeast. Due to the intervening distance and built form together with belts of woodland and mature hedgerows and trees along the Site and surrounding field boundaries, there is virtually no to extremely limited intervisibility between the Site and these heritage assets

In accordance with Historic England's *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (GPA 3)* this report has been produced to identify any heritage assets and their settings that may be affected by the proposals. Paragraph 207 of the National Planning Policy Framework (NPPF) highlights that the significance of these heritage assets needs to be assessed including any contribution made by their settings to determine what the potential impact of changes to the site may have on them.

This report has been undertaken in accordance with Historic England's guidance on heritage assessments, namely *Statement of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12*. The legislation and policy framework applicable to this application is set out at Appendix 1.



Figure 1 Indicative location of site highlighted in red.

2. Historic Development

Carpenders Park was originally an estate based around a manor house of the same name located to the west of the site. This was later converted to a girls 'school, Highfields, and demolished in 1960 to make way for United States Air Force married quarters. These were in turn, demolished in the late 1990s.

The earliest cartographic evidence consulted dates to the 1844 tithe map. The land appears to be largely as it does today but the surrounding area is completely rural in character. The current care home to the west of the site is occupied by a farm at this point.

The accompanying tithe apportionment identifies the landowner and occupier of the northern parcel of land as John Wilshin and the land 'Harbush Field'. The central parcel of land is owned by Thomas Grimston Bucknall Estcourt, occupied by Francis Matthews and described as 'Hill Field'. The field to the south of this is owned by Philip Longmore and occupied by Samuel Vanderplank and land described as 'Rick Yard'. The southern most field is 'Sawpit field' and also owned by Philip Longmore and occupied by Samuel Vanderplank. Other smaller parcels of land are described as 'Woodland Not Titheable'.

Moving forward to the 1872 OS map, little has changed in the area although Carpenders Park is clearly identified to the west of the site with its extensive parkland visible. The wider area is still rural.



Figure 2 1844 tithe map showing indicative location of site in red.



Figure 3 1872 OS map showing indicative location of the site (red) and highly rural context.

2. Historic Development

The 1920 OS map below shows the site and its wider context, showing the heritage assets to the north and south east. The grade II Oxhey Grange is clearly some distance from the site and sat within its own private parkland, completely separate from Carpenders Park and from the site. Similarly Grimsdyke to the south east is separated from the site by numerous parcels of land and is nestled within its own dense wood land. Due to the topography of the land there would be limited to no visual relationship between it and the site.

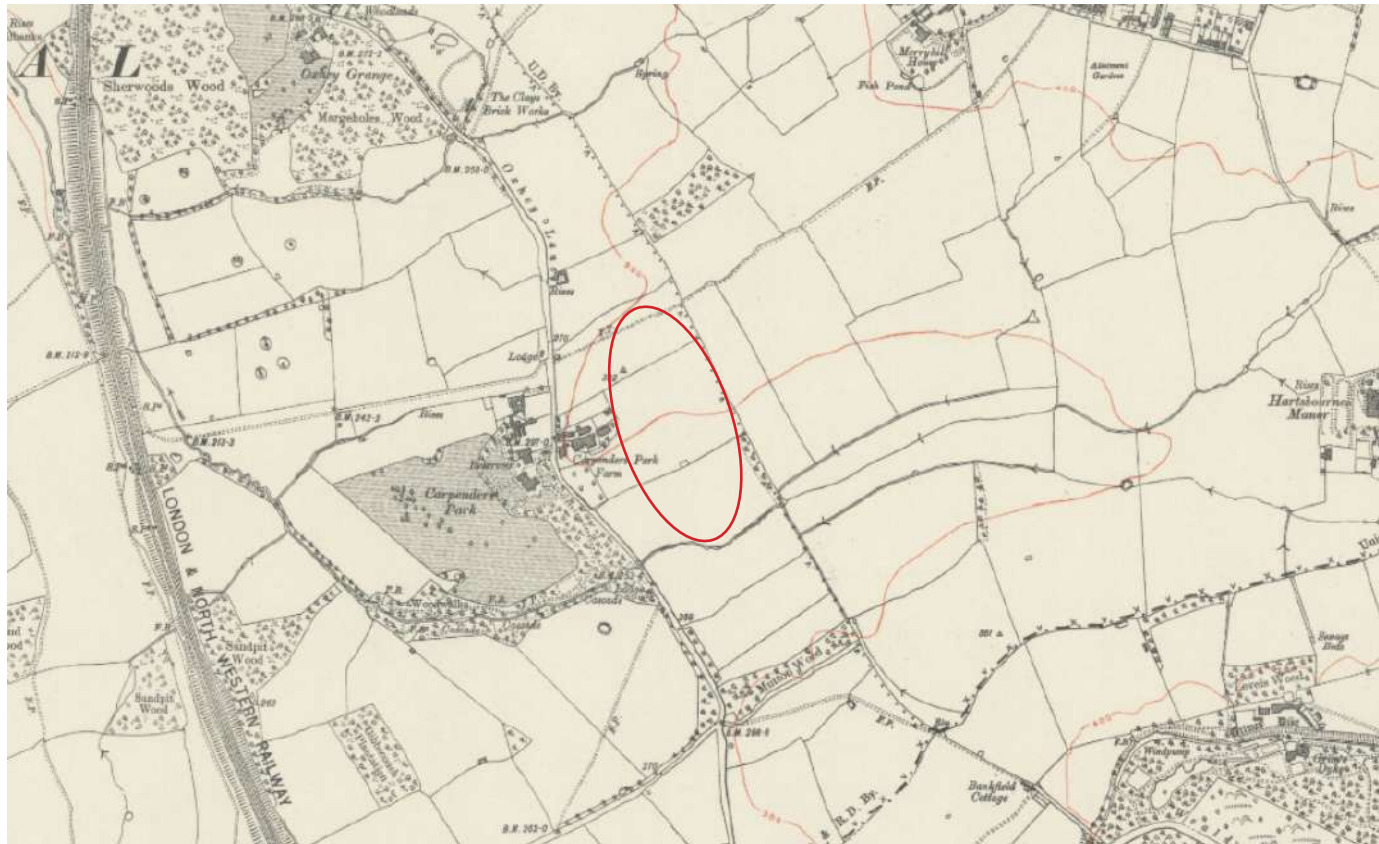


Figure 4 1920 OS map showing still largely rural landscape.

2. Historic Development

The final map shows the site and wider area in 1968. Here the site itself still remains fairly similar to the earlier maps and the farm still survives to the west. To the west of the road the landscape has changed dramatically, with a proliferation of houses and bungalows which were built from the 1930s onwards. The main house on Carpenders Park was demolished in the 1960s and replaced with USAF married quarters.



Figure 5 1968 OS map showing proliferation of development to the west of the site (indicative location in red).

3. The Site

The site consists of three parcels of land (and small segment of the field to the north) with footpaths crossing across them in various points. The western edge of the site is bounded by Oxhey Lane. To the west of the central portion of the site is a modern care home built in the 21st century and replacing an earlier farm. The fields are divided by hedgerows and trees. The northern parcel slopes from north east to south west and the other parcels slope southwards down into a valley which then rises up again beyond the site. Woodland dominates much of the eastern edge of the site (with the exception of the north eastern point which are open fields). The north and southern edges of the site are enclosed by vegetation beyond which are more fields .

The adjacent aerial image shows photograph locations from within the site looking in and out towards the identified heritage assets. There are no direct visual relationships between these assets with the exception, in places of the upper tree canopy of Grims Dyke, although this itself is separated by numerous swathes of woodland. The only clear evidence this is Grims Dyke is the presence of the large radio antennae which rises high above the tree line (visible in photograph 7).

The following numbered photographs correspond with those in figure 6 and show that there is no meaningful relationship between the site and any heritage assets.



Figure 6 Aerial view showing photo locations (numbers correspond with photographs on following pages).

3. The Site



3. The Site



4. Identification of Heritage Assets and Significance Assessment

An inspection of the relevant databases and sources, including the Historic Environment Record (HER), the National Heritage List for England (NHLE), and the Council's website, has identified numerous heritage assets lying within the wider setting of the Site. Following desk based research and on site analysis, professional judgement has been used to identify, and select heritage assets whose significances may be affected by changes to their settings or direct impacts.

This assessment has been undertaken in accordance with Historic England's *The Setting of Heritage Assets GPA 3*. In accordance with Paragraph 207 of the NPPF the level of detail is proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Numerous heritage assets were identified in the wider area of the site as shown in figure 7. Following desk based research and an on-site inspection, no heritage assets were considered to be affected by the proposals due to there being either a lack of visible or experiential connection between the two. To support this conclusion, further information has been provided on a number of these heritage assets, namely:

- A. Front Lodge To Oxhey Grange (850 metres north west of the site)
- B. Oxhey Grange (700 metres north west of the site)
- C. Grim's Ditch: section extending 1500yds (1370m) NE from Oxhey Lane, Scheduled Monument (850 metres south east of the site)
- D. Grims Dyke Grade II Registered Park and Garden, (850 metres south east of the site)
- E. Grimsdyke, Grade II* Listed Building, (1.14km south east of the site)

Other heritage assets are shown in figure 7 but were similarly discounted for the distance from the site and/or due to their relatively localised settings such as the grade II listed London Coal Duty Marker On County Boundary Immediately North West Of Burnt Oak Farm and grade II Stable In The Grounds Of Melodies both over 800 metres to the south of the site.

The following section provides a proportionate assessment of significance of these heritage assets including an assessment of the contribution that their settings make, demonstrating that the site contributes a neutral amount.

4. Identification of Heritage Assets and Significance Assessment

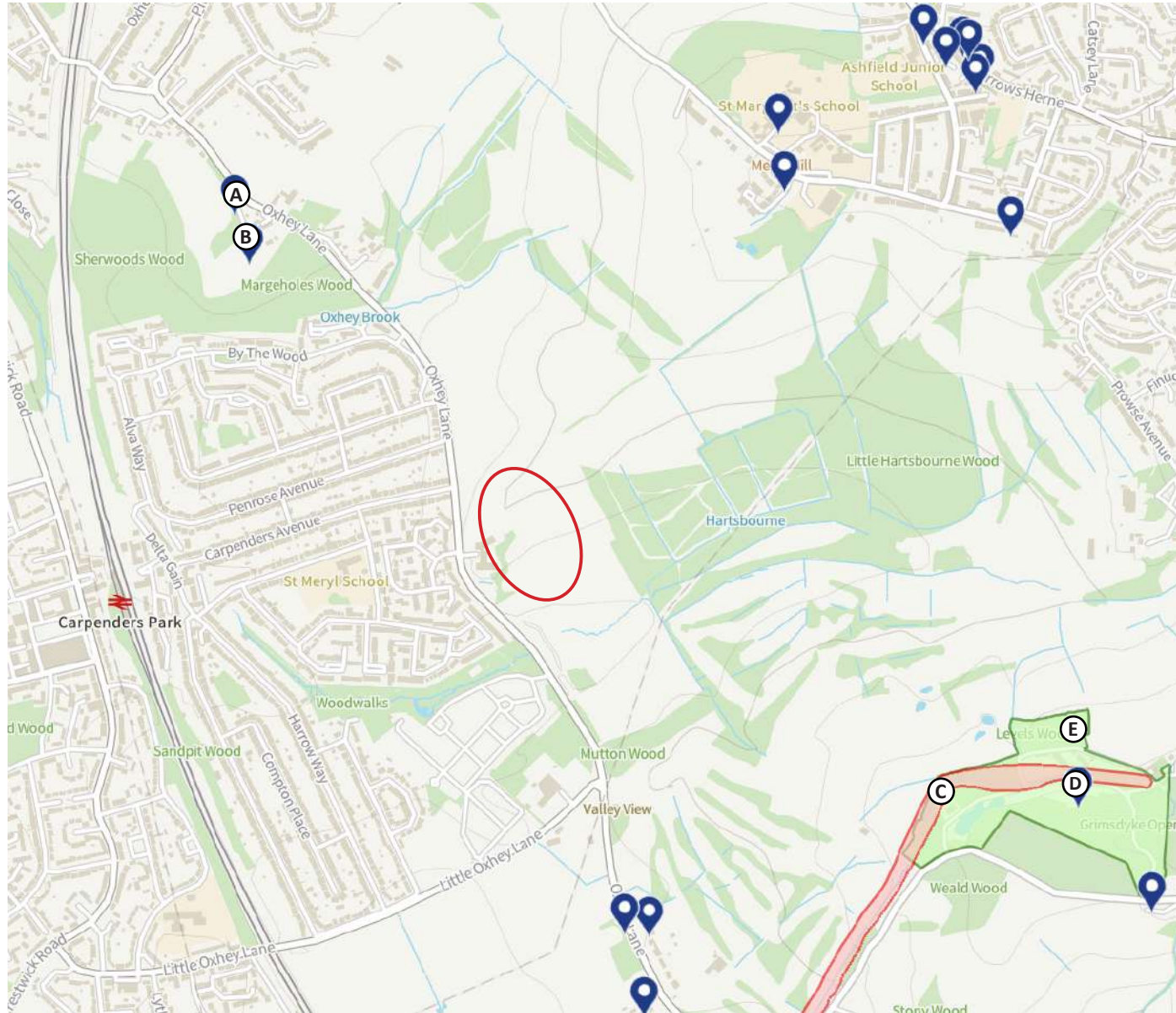


Figure 7 Modern day OS map showing heritage assets in the wider area of the site (those described in detail are identified by letters).

4. Identification of Heritage Assets and Significance Assessment



Figure 8 Oblique aerial map looking north west showing no nearby heritage assets. Distant listed buildings identified as 'A' and 'B'.

4. Identification of Heritage Assets and Significance Assessment

A. Front Lodge To Oxhey Grange (850 metres north west of the site) and B. Oxhey Grange (700 metres north west of the site)

Both buildings were listed in 1985. The list description for the Lodge reads as follows:

Lodge to Oxhey Grange (q.v.). 'Ano Dni 1908' on datestone. Red brick with ashlar dressings. Tiled roof. Square on plan with diagonally cut corners. 1 storey and attic. Symmetrical front to drive with central entrance, panelled door, moulded ashlar surround and bracketed stone hood, datestone above. Ashlar courses at sill and lintel levels of flanking 6 light casements wrapped around corners: 2 lights to fronts, 2 on splays, 2 on returns, leaded lights, chamfered stone mullions. A continuous string course above lintels. Deep boxed eaves interrupted by central 4 light dormer, chamfered stone mullions, stone coped gable. Pyramidal roof hipped to reflect splayed corners. Cruciform central ridge stack. Ashlar and string courses continue on returns. To rear right a 4 light casement, 2 on return, 2 on splay. Gabled dormers as at front on all elevations. 2 light casement on left return. Blocked windows to rear. Interior not inspected.

The list description for the Grange states:

Large house. 1876 by W. Young for W.T. Eley. Extended and altered 1908. Stock brick with red brick and stone dressings. Tiled roofs. High Victorian Gothic Style. Irregular plan, entrance moved in 1908. 2 storeys and attics. Original front to right of present entrance is 3 bays. Left former entrance bay projects. Plinth. Red brick quoins. First floor 8 light timber mullion and transom oriel with plasterwork on coved base and eaves, foliate ornament, date and initials. Hipped roof. Central bay has 2 tall ground floor and 2 small first floor casements in gauged and moulded red brick surrounds. Right bay: 3 ground floor tall casements, first floor 6 light stained glass timber mullion and transom window, chamfered jambs and quadruple pointed relieving arch with a timber balconette. Large gable with decorative tile-hanging and bargeboards. Right return is garden front with step back at return angle. 2 blocks to garden, that to left has a semi-circular turret with ground floor French windows and flanking tall casements. First floor oversails on decorative brick courses, stone course at sill level to similar windows. Brick diapering. Coved eaves with decorative plasterwork as at front to trumpet spire with leaded finial. To left of turret, 2 ground floor windows, initialled plaque on first floor. 4 light stained glass window in return wall from left block to right block, set well back. Central entrance with slightly cambered head, moulded red brick surround. Projecting to right on ground floor is a large canted bay with 36 light ovolo moulded stone mullion and transom windows, leaded panes. Stone coped parapet with ramped up merlons. Further right a canted bay projects with cross windows. 3 small bargeboarded gables to octagonal turret roof with finial. To rear a separately roofed block. 2 storey projecting canted bay to right with cross windows, hipped roof. Red brick diapering and quoins. Ground floor timber



4. Identification of Heritage Assets and Significance Assessment

verandah. Left return from original entrance, ground floor altered in 1908 with stone mullion and transom window in canted bay with date and initials. First floor 4 light window in a projecting bay with a tile hung gable and a panel with earlier date and initials. Set back to left and extending out is long 1908 entrance addition. Massive Neo-Tudor ashlar porch: round arch, key blocked and moulded to recessed entrance, repositioned plank and muntin door has date 1736. Moulded square head to surround. Engaged Doric order to raised parapet with carved relief to centre, putti, fortifications and motto, 2 lion finials and scrolled ends. To right red brick base, stone surrounds to 1 and 3 light windows. To left a Doric loggia, tetrastyle in antis. Behind 1908 addition on original block is C20 basement, ground floor 4 light window with stone surround. First floor 6 light stained glass stair window with ovolo moulded stone surround. Bargeboarded dormer. Interior: 1908 entrance hall panelled and top-lit. Hall to garden has stone columns, shallow timber arches and repositioned angel corbels. Drawing room Neo-Classical plaster ceiling and chimneypiece. Dog-leg stair with barley sugar balusters, carved newel posts. (Pevsner 1977).

Having undertaken historic research and on site analysis, there are no meaningful connections between the site and these buildings. The Lodge is visible from Oxhey Lane but when traversing from north to south quickly disappears as shown in the accompanying photographs. The building's significance primarily lays in its architectural and historic interest, relationship with the road and with the Grange. Similarly, the Grange itself is not visible from the public realm, and historically sat in large parkland, which has been much eroded overtime with new development. The site itself has no relationship with the buildings and **does not contribute** towards their settings and significance.



4. Identification of Heritage Assets and Significance Assessment



4. Identification of Heritage Assets and Significance Assessment

Outlined below is an oblique aerial looking from the south over the grade II* listed Grimsdyke. This building was listed in 1969 and the list description reads as follows:

2. 1872, by Richard Norman Shaw. Large, irregular house of 2 and 3-storeys in modified Tudor style. Red brick and stone with timber-framed gables. Tiled roof. Prominent chimneys. Wing added at east end. Residence of W S Gilbert. Internal features includes highly elaborate alabaster chimney piece by Ernest George.



Figure 9 Oblique aerial map looking north west showing no nearby heritage assets. Distant heritage assets identified as 'C,E and D' (other heritage assets are visible in this view but not assessed as part of this report).

4. Identification of Heritage Assets and Significance Assessment

The building is clearly of very high historic and architectural value due to its association with two prolific and well known architects of the Victorian period. Its setting primarily relates to its surrounding dense woodland and immediate landscaped gardens, which shelter the building away from the surrounding area. The site, at over 800 metres away, is **not considered to contribute** to the building's setting or significance, with the two having no relationship with one another.

The same is true to both the Registered Park and Garden and Scheduled Monument, and the site contributes a **neutral amount** to these heritage assets.



Plate 1 View of southern elevation of Grimdsyke.



Plate 2 View of western elevation of Grimdsyke as seen within its own formal gardens.



Plate 3 Views of Grimdsyke soon disappear when viewed from a distance due to the density of woodland that surrounds it. Here viewed from the footpath to the west.

5. Proposals and Assessment of Impact

Proposal

This Heritage Impact Assessment ('report') has been produced by Handforth Heritage to accompany an outline planning application for the construction of approximately 250 homes, a care home, children's home within open fields to the east of Oxhey Lane. The heritage impact assessment has been produced to see whether there would be any impacts upon any heritage assets as a result on the proposals.

Impact

This assessment has shown that there are no heritage assets within approximately 700 metres of the site. Background research and on site assessment has shown that there is insufficient experiential or visual relationship between the site and the identified heritage assets to result in it providing any contribution to their settings and significance. Consequently, the site is considered to contribute a **neutral amount** to the identified heritage assets. As such, we see no heritage reason why the proposals should not be viewed favourably by the council.

Appendix 1: Legislation, Planning Policy and Guidance

Legislation

Legislation regarding Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) (the 1990 Act).

Section 66(1) states that, in considering whether to grant planning permission for development that affects a listed building or its setting, the local planning authority (LPA) or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest that it possesses.

Section 72(1) states that, in the exercise of planning functions, special attention should be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

The term “preserve”, within the context of Section 66, has been defined within *South Lakeland District Council v Secretary of State [1992]*, where it was held that the “desirability of preserving” creates a presumption against harmful changes, but not a presumption against any change. Case law has established that the preservation of the setting of a listed building requires considerable importance and weight (i.e. the Barnwell Manor judgment) and that a decision-maker who has worked through the paragraphs of the NPPF in accordance with their terms will have complied with the statutory duty set out in the 1990 Act (i.e. the judgment in *Jones v Mordue & Others [2015]*).

In the judgment for *Palmer v Herefordshire Council ([2016] EWCA Civ 106)*, a discussion on the balance between harm and benefit to a listed building was undertaken. It was accepted that “where proposed development would affect a listed building or its settings in different ways, some positive and some negative, the decision-maker may legitimately conclude that although each of the effects as an impact, taken together there is no overall adverse effect on the listed building or its setting”. In essence, where there is some harm and some benefit, these should be given the same weight, and where they are equal in measure, the effect on the listed building would be neutral, and thus its significance would be preserved.

This approach was confirmed in *City & Country Bramshill Ltd v Secretary of State for Housing, Communities And Local Government & Ors [2021]*. In this case Lord Justice Lindblom concluded that ‘the considerable importance and weight to the desirability of preservation [of the special architectural or historic interest of a listed building or its setting], should tip the scales to produce an unequal balance in its favour. However, the SoS should still take account of the actual severity of any change, or scale of change as the Mayoral SPG puts it, and so the extent of impact, as well as the relevance to its significance, and the importance of the asset. The overall weight to be given to any harm, and the conflict with policy, should be a product of these factors.’

National Planning Policy Framework (2024)

The policies relevant to heritage are outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’. The NPPF places much emphasis on ‘significance’ which it defines as:

The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence but also from its setting

Paragraph 207 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, ‘to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal’.

Paragraph 212 requires 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.’

It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, “clear and convincing justification” (Paragraph 213). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to ‘wholly exceptional’ for those assets of the highest significance such as scheduled monuments, Grade I and grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.

Paragraphs 214 and 215 discuss different levels of harm caused to heritage assets and requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of non-designated heritage assets. In relation to non-designated heritage assets, paragraph 216 requires a Local Planning Authority to make a “balanced judgement” having regard to the scale of any harm or loss and the significance of the heritage asset.

With regards to conservation areas and the settings of heritage assets, paragraph 219 requires Local Planning Authorities to look for opportunities for new development to enhance or better reveal their significance.

Planning Practice Guidance

This guidance supports the NPPF and reiterates the importance of conserving heritage assets in a manner appropriate to their significance. Key elements of

the guidance relate to assessing harm. An important consideration should be whether development proposals adversely affect a key element of the heritage asset’s significance:

‘it is the degree of harm, rather than the scale of development that is to be assessed’. The level of ‘substantial harm’ is stated to be a high bar, which may not arise in many cases. Whether development proposals cause substantial harm will be a judgment in the decision-taking process, having regard to the circumstances of the case and by applying the relevant NPPF policies. Such harm may arise from works to the heritage asset or from development within its setting. Setting is defined as:

the surroundings in which an asset is experienced, and may be more extensive than the curtilage.

A thorough assessment of the harm development proposals will have on this setting needs to consider, and be proportionate to, the heritage asset’s significance and the degree to which any changes enhance or detract from that significance, and the ability to appreciate and experience it.

Local Planning Policy

Three Rivers Development Plan documents

The Core Strategy was adopted on 17 October 2011. Strategic Objectives relevant to the application proposals include:

S10. To conserve and enhance the historic environment by resisting the loss of, or damage to, heritage assets including important buildings and to ensure that new development respects the unique character and identity of the towns and villages in the District Three Rivers has a rich historic environment including many historic buildings, archaeological sites, historic structures, historic landscapes, spaces and conservation areas. It will be important to conserve heritage assets and their settings through appropriate control of development but also to enhance the historic environment where opportunities arise

Development Management Policies LDD was adopted July 2013, policies relating to heritage include:

DM3 The Historic Built Environment, which states, *inter alia*:

a) When assessing applications for development, there will be a presumption in favour of the retention and enhancement of heritage assets and to putting heritage assets to viable and appropriate uses to secure their future protection. Applications will only be supported where they sustain, conserve and where appropriate enhance the significance, character and setting of the asset itself and the surrounding historic environment.

i) Historic Parks and Gardens

Planning permission will not be granted for proposals that would cause unacceptable harm to historic parks or gardens (both registered and unregistered), their settings or public views into, out of, or within them.

Appendix 1: Legislation, Planning Policy and Guidance

Guidance Notes

Conservation Principles, Policies, and Guidance (English Heritage, April 2008)

This document outlines Historic England's approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in their own advice and guidance through the planning process, the document is commended to LPAs to ensure that all decisions about change affecting the historic environment are informed and sustainable. This document was published in line with the philosophy of PPS5, yet remains relevant with the NPPF and PPG, the emphasis placed upon the importance of understanding significance to properly assess the effects of change to heritage assets. Guidance within the document describes a range of 'heritage values' that constitute a heritage asset's significance to be established systematically; the four main heritage values include: aesthetic, evidential, communal or historical. The document emphasises that:

considered change offers the potential to enhance and add value to places...it is the means by which each generation aspires to enrich the historic environment

Historic Environment Good Practice Advice in Planning Notes

GPA 2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

This document provides advice on the numerous ways in which decision-making in the historic environment can be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, this document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged, stating that:

...application proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect.

The advice suggests a structured staged approach to the assembly and analysis of relevant information, this is as follows:

- Understand the significance of the affected assets;
- understand the impact of the proposal on that significance;
- avoid, minimise, and mitigate impact in a way that meets the objectives of the NPPF
- look for opportunities to better reveal or enhance significance;
- justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;
- offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The advice reiterates that direct physical change may affect heritage assets, or by change in their setting. Assessment of the nature, extent, and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process resulting in informed decision-taking.

This document sets out the recommended steps for assessing significance and the impact of application proposals upon a heritage asset, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change.

GPA 3: The Setting of Heritage Assets (December 2017) (2nd Edition)

This advice note focuses on the management of change within the setting of heritage assets. This guidance updates that previously published by English Heritage (The Setting of Heritage Assets 2011) in order to ensure that it is fully compliant with the NPPF and is largely a continuation of the philosophy and approach of the 2011 document. It does not present a divergence in either the definition of setting or the way in which it should be assessed.

Setting is defined 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'. The guidance emphasises that setting is not a heritage asset or a heritage designation and that its importance lies in what it contributes to the significance of the heritage asset itself. Elements of setting may make a positive, negative or neutral contribution to the significance of a heritage asset.

While setting is largely a visual concept, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, setting, and thus the way in which an asset is experienced, can also be affected by other environmental factors, including historic associations.

This document states that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset. It is further stated that the contribution made to an asset's significance by their setting will vary depending on the nature of the asset and its setting. Different heritage assets have the capacity to accommodate changes and, therefore, setting should be assessed on a case-by-case basis. Although not prescriptive in setting out how this assessment should be carried out, Historic England recommend using a '5-step process' to assess any effects of a development proposals on the setting and significance of a heritage asset:

- Identifying the heritage assets affected and their settings;
- Assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
- Assessing the effect of the development proposals on the significance of the heritage asset(s);

- Maximising enhancement and minimising harm;
- Making and documenting the decision and monitoring outcomes.