



70 High Street, Reigate, RH2 9AP

Heritage Statement

Ref: 1703_001

November 2025

70 High Street, Reigate, RH2 9AP

Heritage Statement

Ref: 1703_001

NGR: TQ 25134 50268

Sign-off history

issue no.	issue date	prepared by	reviewed by	approved by	reason for issue
1	06/11/2025	KD	RL	-	Draft
2	07/11/2025	-	RL	-	Revision
3	24/11/2025	-	RL	Client	Issue

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Note: Site outlines may appear differently on some figures owing to distortions in historic maps. North may not be up the page and is generally approximate on early maps.

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Executive Summary

We are instructed by clients to prepare a Heritage Statement in relation to development at 70 High Street, Reigate, RH2 9AP.

This desk-based study assesses the possible impacts of the proposed development on built and other heritage assets in the area.

Heritage assets which may be affected comprise:

- The site is a Grade II listed building – a designated asset.
- The site is within a Conservation Area - a designated asset.

Nearby designated assets include buildings and a scheduled monument in proximity.

Conclusions

- The site comprises a Grade II listed building situated within the Reigate High Street Conservation Area and within the setting of designated heritage assets, including the Scheduled Monument of Reigate Castle. The proposals relate to the reinstatement of the front (south) elevation to restore its traditional shopfront in line with the Reigate Town Centre Shop Front Design Supplementary Planning Document.
- The building is of medium significance, deriving from its architectural detailing, historic fabric, and contribution to the collective townscape of the High Street. In its current form, the unauthorised alterations are visually intrusive and detract from the special architectural and historic interest of the listed building and nearby heritage assets.
- The proposed reinstatement of the signage will result in a positive impact through the removal of unsympathetic modern interventions and the reintroduction of authentic materials, proportions, and signage. The use of traditional timber joinery painted fascia, and centralised entrance design will enhance the legibility and aesthetic coherence of the building.
- The works will preserve and enhance the significance of the Grade II listed building and its contribution to the Conservation Area. The proposals will also have no adverse impact on the setting of the designated heritage assets within the vicinity of the site due to a lack of intervisibility and physical separation. The reinstatement will therefore reverse previous harm and ensure the building once again makes a positive contribution to the designated heritage assets and the wider townscape.
- The proposed development would not detract from the character and appearance of the street scene and area in a wider context, nor would it unduly impact upon the residential and commercial amenity of neighbouring occupants.
- The design does not constitute over development and is determined that the works are necessary to ensure the optimum viable use for the site.
- The proposal is considered to accord in full with legislation, national and local heritage policy and advice.

Recommendations

No further heritage reporting is required at this stage.

1 Introduction

1.1 Origin and scope of the report

1.1.1 We are instructed by clients to prepare a Heritage Statement in relation to development at 70 High Street, Reigate, RH2 9AP within the Reigate and Banstead Borough Council administration (the site).

1.1.2 The site is a Grade II listed building located in the Reigate High Street Conservation Area. It is also in the setting of a scheduled monument (Reigate Castle).

1.1.3 Works without planning or listed building consent were undertaken to the external front elevation of the site, specifically with regards to a change of signage for the retail unit. An enforcement notice has been received, and the comments are as follows:

'Further to our recent telephone conversation, I am writing to confirm that no further works to the shop front are to take place until you have obtained the necessary planning permission and listed building consent from the Local Planning Authority.

I understand from our discussion that no internal structural works have been carried out to date. Please ensure that this remains the case — should you wish to undertake any structural alterations in the future, you will need to secure the appropriate consents beforehand.

As we discussed, the current shop front does not meet the requirements set out in local policy and does not preserve or enhance the historic character of this Grade II listed building. You will therefore need to submit a planning application and listed building consent application with revised proposals that are more sympathetic to the building's heritage significance.

For your assistance, I have attached our Shop Front Supplementary Planning Guidance, which provides helpful information and examples of acceptable design approaches for traditional shop fronts.

You will also need consent for any signage on the property. Please note that illuminated signage would not be acceptable on this building. Further guidance on appropriate advertisements is included in the attached document.'

1.1.4 The proposed works now aim to reinstate the south (front) elevation of the site as per the Reigate Town Centre Shop Front Design Supplementary Planning Document. This includes the reinstatement of the original timber fascia.

1.1.5 This desk-based study assesses the impact of the scheme on heritage assets. It forms an initial stage of investigation of the area of proposed development (hereafter referred to as the 'site') and may be required in relation to the planning process in order that the local planning authority (LPA) can formulate an appropriate response in the light of the impact upon any known or potential heritage assets. These are parts of the historic environment which are considered to be significant because of their archaeological, architectural, artistic or historic interests.

1.1.6 The assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (DCLG 2025) and to standards specified by the Institute for Archaeologists (ClfA Oct 2012/Nov 2012), English Heritage (2008, 2011), Historic England (2015) and the Institute of Historic Building Conservation (IHBC 2009). The LPA has referred the applicant to the HER database.

1.1.7 Note: within the limitations imposed by dealing with historical material and maps, the information in this document is, to the best knowledge of the author, correct

at the time of writing.

1.2 Designated Heritage Assets

- 1.2.1 The site is a Grade II listed building. The term "immediate vicinity" relates to the asset's distance to the site, its relative proximity, and key views to the site, therefore any heritage assets which do not meet these criteria are scoped out of consideration as there will be no impact on their setting or significance.
- 1.2.2 There are 3 listed buildings (LBs) within the immediate vicinity of the site (Figure 2). The site is also in the immediate vicinity of Reigate castle, which is a scheduled monument.

1.3 Conservation Area

- 1.3.1 The site is situated within the Reigate High Street Conservation Area (CA).
- 1.3.2 There is a publicly accessible Conservation Area Appraisal on the council's website which has been utilised for this report.

1.4 Nearby Designated Assets

- 1.4.1 There are other listed buildings (LBs) in the wider vicinity.

1.5 Non-designated assets (NDA)

- 1.5.1 There are NDAs in the immediate vicinity. NDAs within the wider vicinity have been scoped out of consideration as there will be no potential for permanent impact on the setting of these assets.

1.6 Setting

- 1.6.1 There is nothing to suggest that appropriate change will be harmful, as a principle.

1.7 Aims and objectives

- Identify the presence of any built heritage assets that may be affected by the proposals;
- describe the significance of such assets, as required by national planning policy;
- assess the likely impacts upon the significance of the assets arising from the proposals; and
- provide recommendations for further assessment where necessary of the historic assets affected, and/or mitigation aimed at reducing or removing completely any adverse impacts upon heritage assets and/or their setting.

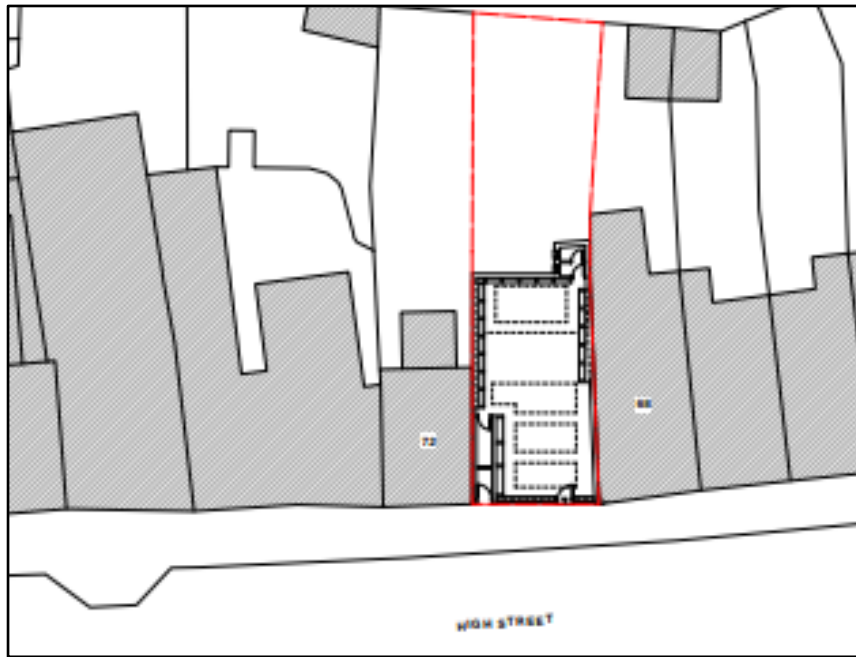


Figure 1: Site location, site outlined in red © Masonwood Design

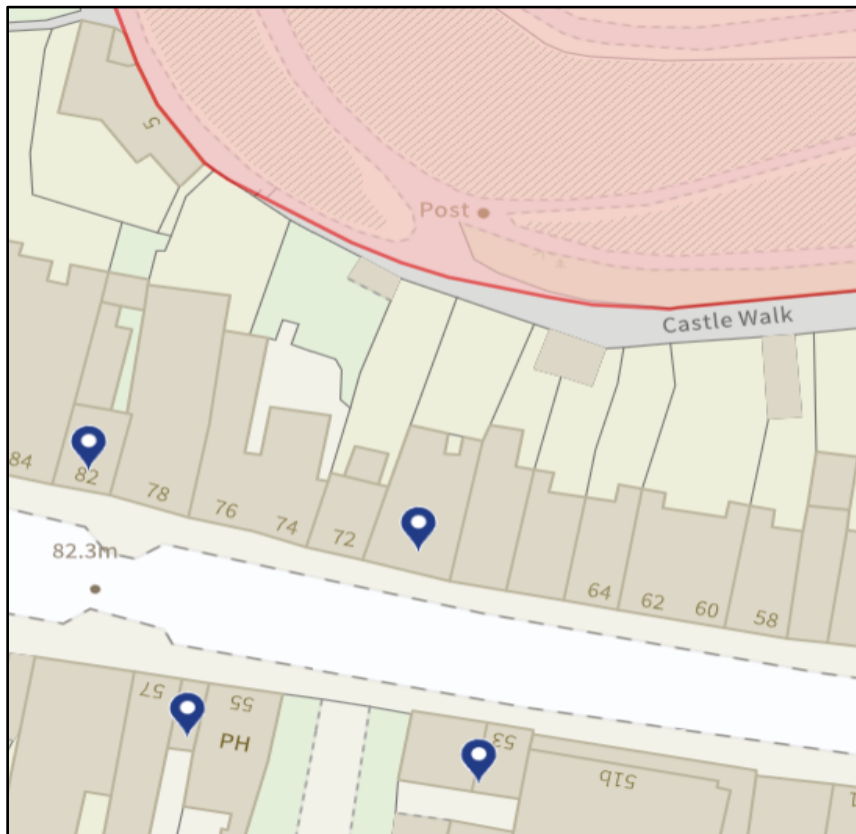


Figure 2: Nearby LBs

2 Site and Environs

2.1 Site

- 2.1.1 The site is located on the south side of Reigate High Street, within a continuous row of historic buildings forming part of the Reigate High Street Conservation Area. The property occupies a mid-terrace position and is flanked by Nos. 68 and 72 High Street to the east and west respectively. To the south, the site fronts directly onto the High Street, a principal commercial thoroughfare characterised by traditional shopfronts and upper storeys of 18th and 19th century origin. To the north, the property backs onto a narrow service area and enclosed garden plots associated with the rear of the High Street properties. The site also lies within the setting of the Scheduled Monument of Reigate Castle, situated approximately 150 metres to the north-west.
- 2.1.2 The surrounding area comprises a mixture of retail, commercial, and residential uses, typical of Reigate's historic town centre. The built form along this section of High Street predominantly consists of two to three storey brick buildings with traditional timber shopfronts and slate or clay-tiled pitched roofs, contributing to a cohesive historic streetscape.

2.2 Designated Heritage Assets

- 2.2.1 The site is a Grade II listed building. The Historic England listing describes this asset as follows:
- 70 HIGH STREET (GII: 1029123)
- HIGH STREET 1. 5388 (North Side) Reigate No 70 TQ 2550 SW 12/8*
- II GV*
- 2. C18 front but core may be older. 2 storeys and attic, 2 windows. High pitched tiled roof with 2 dormers. Stuccoed front. 1st floor sash windows with glazing bars. Modern shop front below.*
- Nos 70 to 76 (even) and No 80 form a group of which Nos 72, 74 and 76 are local interest only.*
- Listing NGR: TQ2514150272*
- 2.2.2 The building is a listed Grade II designated heritage asset and as such is of **medium significance**, as a baseline. The significance of this heritage asset is largely derived from its age and intactness of its built fabric which contributes to its historical and architectural interest.
- 2.2.3 There are 3 listed buildings (LB) within the immediate vicinity of the site and a scheduled monument.
- Reigate Castle (SM: 1005947)
- 2.2.4 This heritage asset is situated c. 40m west from the site. The Historic England listing states:
- This record has been generated from an "old county number" (OCN) scheduling record. These are monuments that were not reviewed under the Monuments Protection Programme and are some of our oldest designation records. As such they do not yet have the full descriptions of their modernised counterparts available.*

Please contact us if you would like further information.

- 2.2.5 This heritage asset is a scheduled monument and as such is of **high significance**, as a baseline. The significance of this heritage asset is largely derived from its age, historical connections and extensive communal value which contribute to its historical interest.

82 High Street (GII: 1029124)

- 2.2.6 This heritage asset is situated c. 44m south from the site. The Historic England listing describes this asset as follows:

Reigate HIGH STREET (North Side) No 82 (Formerly listed as No 80)

GV II Circa 1800 front of 3 storeys, one bay with later alterations, but concealing a timber framed core of late medieval period. Red brick with some blue headers. Fairly low pitched tiled roof with left end chimney. Gauged flat brick arches to modern plate glass windows on 1st floor. Early C20 shop front below.

Nos 70 to 76 even and No 80 form a group, of which Nos 72, 74 and 76 are local interest only.

2.2.7 THE BULL'S HEAD INN (GII: 1029080)

- 2.2.8 This heritage asset is situated c. 40m southwest from the site. The Historic England listing describes this asset as follows:

HIGH STREET 1. 5388 (South Side) Reigate 19.10.51. No 55 (The Bull's Head Inn) No 57 TQ 2550 SW 12/9

||

2. Late C17 timber framed pair re-fronted in early-mid C19. Stucco fronts, raised quoins. High pitched roofs renewed in machine tiles. Each 2 storeys and attic, 2 windows. No 55 has 2 hipped dormers and No 57 a modern flat dormer. 1st floor small paned modern casements in narrow moulded wood architraves. Eaves cornice to No 55. Modern windows and half glazed door on ground floor. Left part of No 57 has a through passage with visible square timber framing.

2.2.9 53 AND 53A, HIGH STREET

- 2.2.10 This heritage asset is situated c. 30m southeast from the site. The Historic England listing describes this asset as follows:

HIGH STREET 1. 5388 (South Side) Reigate Nos 53 end 55A TQ 2550 SW 12/275 7.11.72.

||

2. Hall house of circa 1500 with service end removed and exterior altered. Front of one storey and attic, 3 windows. Stucco with incised lines. High pitched roof of renewed clay tiles with a long hip below gablet at left, and a short lower extension. Square headed modern dormers. Modern plain shop fronts below. Interior shows fairly heavy timber work. Jowled posts and big arch braces to ties and plates. Diagonal braces down to half rail. Fairly close but rather irregular studding. Slightly arched ties. 2 bay hall has collar-purlin roof and crown post with transverse braces to ties, longitudinal to purlin.

Good carpenters' marks. On ground floor triple service doors with hollow-chamfered jambs and round arches; a similar doorway at other end of hall has flattened arch and moulded spandrels.

- 2.2.11 These buildings are listed Grade II designated heritage assets and as such are of **medium significance**, as a baseline. The significance of these heritage assets is largely derived from their age and intactness of their built fabric which contributes to their historical and architectural interests.

2.3 Conservation Area

- 2.3.1 The site is situated within the Reigate High Street Conservation Area (CA) (Figure 3) which was designated in 1970.

- 2.3.2 The Conservation Area Appraisal was adopted in February 2015 and describes the general character of the CA as follows:

"The town is located south of the North Downs side and the M25, in the Holmesdale valley, to the north of the greensand hills. The special interest of a conservation area is derived from the interrelationship between the particular townscape and landscape features and it is this character, which the local planning authority will seek to preserve or enhance through statutory and discretionary controls. The special interest of the Reigate conservation area is derived from the interrelationship between the format of a traditional and historic market town with high street, former castle and former priory and deer park, complemented by the later Georgian and Victorian expansion of the town. The predominant character of the Conservation Area buildings is vernacular and Georgian with Victorian and early 20th century redevelopment and expansion. There is a need to ensure the cohesiveness of the buildings is not eroded by insensitive development.

The town historically was one of the major towns in Surrey and the footprint development in the Conservation Area was well established by the Georgian period. The railway resulted in Victorian redevelopment and Victorian housing in the northern part of the Conservation Area, with another burst of redevelopment following the sale of the town in 1920, which resulted in some loss of Georgian buildings but was luckily limited by the opportunity for existing leaseholders and tenants to purchase their freehold."

- 2.3.3 The CA is a designated heritage asset and as such is of **medium significance**, as a baseline. It is clear that the CA has evidential and historic values which contribute substantially to its overall significance. It can be argued that whilst the CA has been the subject of modern development over time, various elements of the area retain aesthetic value. There is also some communal value.
- 2.3.4 Whilst the site and CA have been the subject to change over time; generally, the overall significance of these assets has remained unharmed.

2.4 Non-designated assets (NDAs)

- 2.4.1 There are NDAs in the immediate vicinity. NDAs in the wider vicinity have been scoped out of consideration as there will be no potential for permanent impact on the setting of these assets.



Figure 3: Reigate High Street Conservation Area outlined in black © Reigate and Banstead Borough Council

2.5 Setting

- 2.5.1 Setting is generally taken to mean 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 an asset, may affect the ability to appreciate that significance or may be neutral (NPPF 2023 Glossary).
- 2.5.2 A setting is not an asset in its own right, nor does it have significance unless part of another heritage designation.
- 2.5.3 The contribution of setting is generally considered with reference to the Historic England document Good Practice Advice in *Planning Note 3 The setting of heritage assets* (3rd edition 2020) (GPA3).
- 2.5.4 The contribution of setting to the significance of assets is an important consideration. The site is within the Conservation Area and as such its own setting is contiguous with the CA.

3 Significance

3.1 Planning History

3.1.1 A review of the LPA website reveals the following previous planning applications for the site:

- Refurbishment of upper floor offices together with works to the roof, windows, means of escape and balustrading.
Ref. No: 07/00286/LBC | Validated: Mon 12 Feb 2007 | Status: Decided (Approved)
- Display of non-illuminated projecting sign. Drawing No: B11701-1
Ref. No: 05/00966/ADV | Validated: Tue 26 Apr 2005 | Status: Decided (Approved)
- Display of non-illuminated projecting sign. Drawing No: B11701-1
Ref. No: 05/00962/LBC | Validated: Tue 26 Apr 2005 | Status: Decided (Approved)
- Projecting sign. (Drwg No. B11701-1)
Ref. No: 04/02842/LBC | Validated: Wed 12 Jan 2005 | Status: Withdrawn
- New shopfitting works
Ref. No: 01/00654/LBC | Validated: Mon 02 Apr 2001 | Status: Decided (Approved)
- Non-illuminated fascia sign. (Projecting sign withdrawm by amended plans on 7/6/01)
Ref. No: 01/00556/ADV | Validated: Tue 20 Mar 2001 | Status: Decided (Approved)
- DISPLAY OF HAND PAINTED SIGN ON FIRST FLOOR FRONT ELEVATION
Ref. No: 94/04630/LBC | Validated: Tue 26 Apr 1994 | Status: Decided (Refused)
- DISPLAY OF HAND PAINTED SIGN ON FIRST FLOOR FRONT ELEVATION
Ref. No: 94/04640/ADV | Validated: Tue 26 Apr 1994 | Status: Decided (Refused)
- DISPLAY OF EXTERNALLY FLOODLIT FASCIA AND HANGING SIGNS.
Ref. No: 87/05780/ADV | Validated: Mon 18 May 1987 | Status: Unknown
- CHANGE OF USE FROM RETAIL SHOP TO BUILDING SOCIETY OFFICE - GROUND FLOOR PREMISES ONLY.
Ref. No: 87/01190/F | Validated: Fri 06 Feb 1987 | Status: Decided (Refused)

3.2 Change

3.2.1 Taking the site as a whole, there has been a pattern of change. Organic and incremental changes are likely to continue and also indicates that appropriate change is acceptable.

3.3 Statement of Significance

3.3.1 Significance, as described in the National Planning Policy Framework (NPPF), is “the value of a heritage asset to this and future generations because of its heritage interest”. According to the NPPF “heritage interest” may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

- **Archaeological interest:** there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
- **Architectural and artistic interest:** these are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
- **Historic interest:** an interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.

Archaeological Interest

- 3.3.2 Given the building's proximity to the Scheduled Monument and the documented presence of medieval and post-medieval archaeological deposits in the surrounding area, the site is considered to be of high archaeological interest. However, it is noted that the proposed works are confined to the existing above-ground fabric of the front elevation and do not include any below-ground disturbance or excavation.
- 3.3.3 Accordingly, while the site's archaeological potential remains high, the absence of any proposed groundworks means that the development will not give rise to any direct archaeological impact. No further archaeological investigation is therefore considered necessary in relation to the current scope of works.

Architectural and Artistic Interest

- 3.3.4 The architectural interest of 70 High Street lies primarily in its role as part of the historic commercial frontage of Reigate High Street, a designated Conservation Area characterised by its continuous rows of 18th and 19th century shopfronts and upper façades. The building is Grade II listed, reflecting its historic and architectural significance as a representative example of traditional town-centre commercial architecture.
- 3.3.5 Architecturally, the property exhibits timber-framed shopfront detailing, sash windows, and a painted timber fascia and door surround, all of which contribute to its historic character and visual unity with the adjoining terraces.
- 3.3.6 The proposed reinstatement works seek to remove the as-built elements and reinstate the original, white-painted timber fascia, install a traditional centralised timber door with fanlight, and non-illuminated painted signage in line with the Reigate Town Centre Shop Front Design Supplementary Planning Document. These measures will restore the building's architectural integrity and reinforce its contribution to the wider streetscape, which is defined by a coherent rhythm of proportioned shopfronts with restrained decorative treatment.
- 3.3.7 The building's artistic interest is modest yet evident in the craftsmanship and detailing of its traditional joinery, painted fascia, and fenestration, all of which reflect local vernacular traditions and historic shopfront design.
- 3.3.8 The building has group value with other similar structures along the street and those in the wider Conservation Area, thereby positively contributing to the Conservation Area's significance.

Historic Interest

- 3.3.9 The High Street formed the principal spine of the medieval settlement, connecting Reigate Castle to the east–west trading routes, and properties such as No. 70 represent the continuity of commercial use that has characterised the area for centuries. The building's layout, scale, and position on the historic burgage plot reflect this enduring urban morphology. Collectively, these features allow the site to contribute to the understanding and experience of Reigate's historic townscape.
- 3.3.10 Overall, the building retains a strong evidential and associative link to Reigate's long history of commercial and civic life. Its presence within the setting of Reigate Castle (Scheduled Monument) further strengthens its historic value, providing tangible continuity between the medieval origins of the settlement and its evolving urban fabric. The historic interest in the building is largely associated to its connections to the original market town and it contributes to the collective experience
- 3.3.11 Considering the above interests and in accordance with Table 1 (see Section 8), the building is determined to be of **medium significance**.

4 Impact of Development

4.1 Proposed Development

- 4.1.1 The proposed development seeks to reinstate the front (south) elevation of the property in accordance with the Reigate Town Centre Shop Front Design Supplementary Planning Document. Works include the removal of the existing unauthorised shopfront and signage and the restoration of a traditional timber fascia, central timber door with fanlight, and painted non-illuminated signage. The proposals aim to enhance the building's historic character, ensuring that the new shopfront is sympathetic in scale, materials, and detailing to the Grade II listed building and its Conservation Area setting.

4.2 Impact on the Site

- 4.2.1 It is determined that the site derives most of its significance from its aesthetic and historic values. It can be argued that the aesthetic value is largely associated with the exterior, as this is an aspect of the building in which the group value is derived.
- 4.2.2 By reinstating the traditional timber fascia, fanlight, and painted signage, the proposals will restore the building's historic appearance, re-establishing its proportion, symmetry, and visual coherence within the terrace. The reinstatement will therefore reverse previous harm and enhance the building's aesthetic, historical and evidential value. Impact will be in the **positive**.

4.3 Impact on Designated Assets

- 4.3.1 In its current form, the site is causing a negative impact on the setting of nearby listed buildings and the Scheduled Monument of Reigate Castle. The existing unauthorised shopfront and signage detract from the significance of these assets.
- 4.3.2 The proposed reinstatement works, through the use of complementary traditional materials and authentic design detailing, will have a positive and restorative effect on the significance of these assets. The reinstated shopfront will preserve and enhance their special architectural and historic interests, aligning with both national and local heritage policy objectives.
- 4.3.3 Overall, the reinstatement will reverse previous harm, enhance the character of these heritage assets, and reinforce the historic coherence of this part of the High Street, resulting in a **positive impact** on significance.
- 4.3.4 By virtue of lack of intervisibility, relative disposition and intervening built forms, the development will not be within and therefore have no material impact on the setting of any other designated heritage assets in the wider vicinity. The development also won't feature in any long distance or key views, resulting in a **visually neutral impact**.

4.4 Impact on Conservation Area

- 4.4.1 The property forms part of the Reigate High Street Conservation Area, a designated heritage asset recognised for its coherent architectural character and historic urban form. In its current condition, the unauthorised shopfront and associated signage detract from the visual quality and historic continuity of the High Street, introducing discordant modern materials and proportions that conflict with the established pattern of traditional façades.
- 4.4.2 The proposed reinstatement works will reverse this negative contribution, reintroducing authentic detailing and sympathetic materials in accordance with the Reigate Town Centre Shop Front Design Supplementary Planning Document. The reinstatement of the white-painted timber fascia, timber door with fanlight, and hand-painted signage will re-establish the building's historic proportions and visual harmony within the terrace, thereby enhancing the overall appearance and

significance of the Conservation Area.

- 4.4.3 By restoring a historically appropriate and proportioned shopfront, the development will make a strong positive contribution to the townscape, reinforcing the traditional character and architectural rhythm that define this part of Reigate High Street. The proposal will therefore preserve and enhance the character and appearance of the Conservation Area resulting in a **positive impact**.
- 4.4.4 By virtue of lack of intervisibility, relative disposition and intervening built forms, the development will not be within and therefore have no material impact on the setting of any other CAs in the wider vicinity. The development also won't feature in any long distance or key views, resulting in a **visually neutral impact**.

4.5 Setting

- 4.5.1 Historic England's GPA3, para 17 on, sets out a five 'staged' approach to proportionate decision-taking regarding assessing setting:
- Step 1: Identify which heritage assets and their settings are affected (i.e. the surroundings within which an asset is experienced)
 - Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
 - Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it
 - Step 4: Explore ways to maximise enhancement and avoid or minimise harm; and
 - Step 5: Make and document the decision and monitor outcomes (this latter stage is generally the preserve of the LPA).
- 4.5.2 Within the framework of the 5 stages, it is general practice to consider the setting of an asset in 3 'layers':
- Contextual – the wider landscape/townscape
 - Intimate – the immediate and proximate
 - Prospect – setting as experienced from within (usually the property boundary/curtilage).
- 4.5.3 The contextual setting of the site is defined by the historic commercial core of Reigate, an area that evolved from a high street market and retains a consistent urban grain of narrow frontages and traditional building forms. This part of the High Street is characterised by closely spaced Georgian and Victorian façades, with continuous active frontages and a well-preserved roofline. The setting also includes the Reigate Castle Scheduled Monument, which, though separated by topography and intervening buildings, provides historical context.
- 4.5.4 The intimate setting of the site comprises the adjoining terraced buildings (Nos. 68 and 72 High Street), which share similar scale, materials, and shopfront proportions. The current unauthorised alterations to No. 70 disrupt this local harmony and introduce an incongruous element within the group. The proposed reinstatement of the traditional timber shopfront will therefore restore the architectural rhythm and visual balance along this part of the terrace, improving the intimate setting of both the building and its immediate neighbours.
- 4.5.5 The prospect setting, as experienced from within the property and directly in front of the elevation, is one of an active commercial frontage within a historic urban streetscape. The reinstated frontage will positively contribute to this experience, reinforcing the building's authenticity and its sense of place within the High Street. Views toward and from the site will once again reflect the historic character and material coherence of the Conservation Area.

4.6 Harm

- 4.6.1 The NPPF, at paras 212-220 refers to harm to the significance of designated and non-designated heritage assets.
- 4.6.2 It is considered that the proposal will cause no harm to the significance of any asset; there will be change, but overall that change will be in the positive and will better reveal the significance of the affected assets. As there is no harm there is no duty to prove public benefit, etc.
- 4.6.3 Overall, the proposal will represent an enhancement through use of complementary materials and considered design.

4.7 The Duty to Preserve or Enhance

- 4.7.1 It is considered that the proposal will enhance the appearance and character of the area, and it will preserve its significance – impact will be in the positive.

5 Photos

5.1 Photos

5.1.1 This section contains photographs to provide context, they are not extensive.



Plate 1 © Client



Plate 2 © Client



Plate 3 © Client

6 Conclusions and Recommendations

6.1 Conclusions

- 6.1.1 The site comprises a Grade II listed building situated within the Reigate High Street Conservation Area and within the setting of designated heritage assets, including the Scheduled Monument of Reigate Castle. The proposals relate to the reinstatement of the front (south) elevation to restore its traditional shopfront in line with the Reigate Town Centre Shop Front Design Supplementary Planning Document.
- 6.1.2 The building is of medium significance, deriving from its architectural detailing, historic fabric, and contribution to the collective townscape of the High Street. In its current form, the unauthorised alterations are visually intrusive and detract from the special architectural and historic interest of the listed building and nearby heritage assets.
- 6.1.3 The proposed reinstatement of the signage will result in a **positive** impact through the removal of unsympathetic modern interventions and the reintroduction of authentic materials, proportions, and signage. The use of traditional timber joinery painted fascia, and centralised entrance design will enhance the legibility and aesthetic coherence of the building.
- 6.1.4 The works will preserve and enhance the significance of the Grade II listed building and its contribution to the Conservation Area. The proposals will also have no adverse impact on the setting of the designated heritage assets within the vicinity of the site due to a lack of intervisibility and physical separation. The reinstatement will therefore reverse previous harm and ensure the building once again makes a **positive contribution** to the designated heritage assets and the wider townscape.
- 6.1.5 The proposed development would not detract from the character and appearance of the street scene and area in a wider context, nor would it unduly impact upon the residential and commercial amenity of neighbouring occupants.
- 6.1.6 The design does not constitute over development and is determined that the works are necessary to ensure the optimum viable use for the site.
- 6.1.7 The proposal is considered to accord in full with legislation, national and local heritage policy and advice.

6.2 Recommendations

- 6.2.1 No further heritage reporting is required at this stage.

7 Planning and Heritage Framework

7.1 Statutory protection

Listed Buildings and Conservation Areas

- 7.1.1 The *Planning (Listed Buildings and Conservation Areas) Act 1990* sets out the legal requirements for the control of development and alterations which affect buildings, including those which are listed or in conservation areas. Buildings which are listed or which lie within a conservation area are protected by law. Grade I are buildings of exceptional interest. Grade II* are particularly significant buildings of more than special interest. Grade II are buildings of special interest, which warrant every effort being made to preserve them.

7.2 National Planning Policy Framework

- 7.2.1 The Government issued the National Planning Policy Framework (NPPF) in March 2012 (DCLG 2012) and supporting Planning Practice Guidance in 2014 (DCLG 2014). This advice was last updated in 2025.
- 7.2.2 One of the 12 core principles that underpin both plan-making and decision-taking within the framework is to '*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.*' It recognises that heritage assets are an irreplaceable resource and requires the significance of heritage assets to be considered in the planning process, whether designated or not. The contribution of setting to asset significance needs to be considered.
- 7.2.3 Section 16: Conserving and Enhancing the Historic Environment sets out the heritage-related consent regimes for which local planning authorities are responsible under the *Planning (Listed Buildings and Conservation Areas) Act 1990*, as well as to plan-making and decision-making.
- 7.2.4 Paras 202-221 inclusive refer:
202. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
203. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:
- d) the desirability of sustaining and enhancing the significance of heritage assets,
and putting them to viable uses consistent with their conservation;
 - e) the wider social, cultural, economic and environmental benefits that conservation
of the historic environment can bring;
 - f) the desirability of new development making a positive contribution to local
character and distinctiveness; and
 - g) opportunities to draw on the contribution made by the historic
environment to the character of a place.

204. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.
205. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:
- a) assess the significance of heritage assets and the contribution they make to their environment; and
 - b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.
206. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

Proposals affecting heritage assets

207. 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.

208. 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.

209. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

210. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

211. In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should

have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

Considering potential impacts

212. 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.

213. 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.

214. 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.

215. 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.

216. 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.

217. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

218. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part)

in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

219. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

220. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

221. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

7.3 Local Policy

Reigate and Banstead Local Plan: Core Strategy 2014 and Development Management Plan 2019

7.3.1 The Reigate and Banstead Local Plan: Core Strategy 2014 and the Development Management Plan 2019 were adopted in 2014 and September 2019, respectively and they outline how the area will develop and the policies which will guide new developments. Of relevance to this report are the following policies:

- Policy CS4: Valued townscapes and the historic environment
- Policy NHE9: Heritage assets

7.3.2 It is determined that the proposal is in keeping with the parameters set out within these policies.

8 Methodology

8.1.1 Significance, as described in the National Planning Policy Framework (NPPF), is “the value of a heritage asset to this and future generations because of its heritage interest”. According to the NPPF “heritage interest” may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

- **Archaeological interest:** *there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.*

- **Architectural and artistic interest:** *these are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.*

- **Historic interest:** *an interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.*

8.1.2 The tables below are used throughout this report to determine significance and impacts. Table 1 is used to assess significance, with magnitude of impact determined using Table 2. Table 3 consolidates the results from both Tables 1 and 2 to determine overall heritage impact.

VERY HIGH	<ul style="list-style-type: none"> · World Heritage Sites · Other buildings of recognised international importance
HIGH	<ul style="list-style-type: none"> · Scheduled Ancient Monuments with standing remains · All Grade I and all Grade II* Listed Buildings · Some Grade II listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in their listing grade · Conservation Areas containing very important buildings · Undesignated structures of clear national importance
MEDIUM	<ul style="list-style-type: none"> · Some Grade II Listed Buildings · Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical associations · Conservation Areas containing buildings that contribute significantly to its historic character · Historic townscape or built-up areas with important historic integrity in their buildings, or built settings (e.g., including street furniture and other structures)
LOW	<ul style="list-style-type: none"> · Locally listed buildings · Historic (unlisted) buildings of modest quality in their fabric or historical association · Historic townscape or built-up areas of limited historic integrity in their buildings, or built settings (e.g., including street furniture and other structures)
NEGLIGIBLE	· Buildings of no architectural or historical note

Table 1: Assessment of Significance. Adapted from Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (2007)

HIGH	Changes to most or all of the key archaeological or key heritage baseline elements, or comprehensive changes to the setting of such key features that lead to total or almost complete alteration of a features' physical structure, dramatic visual alteration to the setting of a heritage asset, or almost comprehensive variation to aspects such as noise, access, or visual amenity of the historic landscape.
MEDIUM	Changes to many key archaeological materials/historic elements, or their setting, such that the baseline resource is clearly modified. This includes considerable visual change to many key aspects of the historic landscape, noticeable differences in noise or sound quality, and considerable changes to use or access changes to key historic landscape elements.
LOW	Detectable impacts which alter the baseline condition of an archaeological or heritage receptor to a slight degree – e.g., a small proportion of the surviving heritage resource is altered; slight alterations to the setting or structure, or limited changes to aspects such as noise levels, use or access that results in limited changes to historic landscape character.
NEGLIGIBLE	Barely distinguishable change from baseline conditions, where there would be very little appreciable effect on a known site, possibly because of distance from the development, method of construction or landscape or ecological planting, that are thought to have no long-term effect on the historic value of a resource.
UNKNOWN	Extent / nature of the resource is unknown and the magnitude of change cannot be ascertained.

Table 2: Magnitude of Impact. Adapted from Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (2007)

MAGNITUDE OF IMPACT	SIGNIFICANCE OF HERITAGE ASSET				
	VERY HIGH	HIGH	MEDIUM	LOW	NEGLIGIBLE
No Change	Neutral	Neutral	Neutral	Neutral	Neutral
Negligible	Slight	Slight	Neutral/Slight	Neutral/Slight	Neutral
Low	Moderate/Large	Moderate/Slight	Slight	Neutral/Slight	Neutral/Slight
Medium	Large/Very Large	Moderate/Large	Moderate	Slight	Neutral/Slight
High	Very Large	Large/Very Large	Moderate/Large	Slight/Moderate	Slight

Table 3: Heritage Impact. Adapted from Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (2007)

