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By email

Dear David Lamb

**LAND TO THE WEST OF THE A507 BETWEEN COTTERED AND CROMER, HERTFORDSHIRE,
SG9 9PU. Application No. 3/24/2245/FUL**

This letter is in response to your comments of 15/1/25 and Historic England's comments of 10/1/25.

The proposal site comprises open agricultural land (also incorporating a private, civil airfield strip of grass) west of the village of Cottered and northeast of the hamlet of Cromer in Hertfordshire. It is divided into two areas, the main body of the site and a further separate field (henceforth described as SW1) to south-west of the main site area and proximate to the hamlet of Cromer. It is bounded to the north-east by the A507, to the south by the B1037 and the River Beane crosses the site on an approximate ENE/WSW alignment, along with a tributary stream further south. Overall, the proposal site measures approximately 79.5 hectares and is within the administrative area of East Hertfordshire.

Overview

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that *'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'*.

Paragraph 207 of the National Planning Policy Framework (NPPF) states that *'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.'*

The definition of the setting of a heritage asset is provided in Annex 2 of the NPPF: *'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.'*

LAND TO THE WEST OF THE A507 BETWEEN COTTERED AND CROMER, HERTFORDSHIRE, SG9 9PU

A Heritage Statement has been provided (combined archaeology/built heritage). In respect of built heritage Historic England's *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (2nd edition, December 2017) was referred to in the assessment of relevant built heritage assets.

The proposal site does not sit within a conservation area, nor does it contain any designated or non-designated built heritage assets; however various built heritage assets are located within the vicinity. After further detailed examination of the Historic Environment Record (HER), a site survey and extensive walkover of the local area (Cottered, Cromer, Luffenhall and Hare Street) the majority of the built heritage assets were able to be scoped out from further analysis due to the facts that their historical associations, settings or significance are not reliant upon the proposal site or they remain well removed and/or screened from it due to extant residential development and/or interceding vegetation.

This letter follows your Order of Assessment of Built Heritage Assets within your letter of 15/1/25:

Cottered Conservation Area

The conservation area contains a large number of listed buildings concentrated within its historic core. The open spaces and pasture land contained therein contribute to its general spatial quality and visual importance.

The Cottered Conservation Area (CCA) and the listed buildings and spaces it contains are extremely insular - within the boundaries of the CCA there is no experience of the area that encloses them and the surrounding wider rural setting is only appreciated once the village has been exited and journeyed away from. Accordingly the CCA was able to be scoped out from further assessment as there would be no harm to its significance.

The conclusions in the HIA are agreed with by the local planning authority (LPA) and Historic England.

Garden House Registered Park & Garden, Cottered (Grade II*) and listed structures therein (Grade II)

This is an early twentieth century garden created by Herbert Goode in Japanese style. Further ornamental gardens/parkland surround a country house.

There is no intervisibility between the Grade II* listed Registered Park and Garden 'the Garden House, Cottered' and the listed structures therein, due to distance, topography and intervening vegetation/development. Accordingly these built heritage assets were able to be scoped out from further assessment.

The HIA conclusion is agreed with by Historic England; however the LPA states that further evidence of the lack of intervisibility is required as the listing mentions the rural setting contributing to its significance; however the listing only states that the setting is rural, but does not comment on any contribution to significance. We concur with Historic England that there would be no harmful visual impact.

Lilac Cottages – Grade II and Nottinghams, Cottered – Grade II

Lilac Cottages are early timber frame on stuccoes sill, eighteenth century built heritage assets, with matching nineteenth/twentieth century extensions. Nottinghams is a timber frame, seventeenth century house with early nineteenth century heightened walls and flatter pitched roof.

These built heritage assets were able to be scoped out from further analysis due to the facts that their historical associations, settings or significance are not reliant upon the proposal site and they remain well removed and screened from it.

This conclusion is agreed with by the LPA, no comment from Historic England.

Scaldsgrove – Grade II

This built heritage asset comprises a two storey, seventeenth century or earlier timber frame house with an eighteenth century bay.

LAND TO THE WEST OF THE A507 BETWEEN COTTERED AND CROMER, HERTFORDSHIRE, SG9 9PU

Scaldsgrove was able to be scoped out from further analysis due to the facts that its historical associations, settings or significance are not reliant upon the proposal site and it remains removed and screened from it.

No comment from Historic England, however the LPA states that there could be some invisibility between the house and the Site. As stated above, this built heritage asset is screened from the Site due to extant interceding vegetation and it is not possible to appreciate its significance from the Site. Furthermore, it does not face towards the Site, its main front and rear elevations face east and west respectively. We maintain our conclusion that this built heritage asset is able to be scoped out from further assessment.

Brick Barn – Grade II

Sixteenth century timber frame barn, cased in brick in 1963.

It was assessed that the extant setting of the barn has altered considerably - it is now surrounded by modern structures and the very busy A507. It was concluded that the harm to its significance would be less than substantial, at the mid-range of that scale.

The less than substantial harm to its setting is agreed with by the LPA, no comment from Historic England. The less than substantial harm would be weighed against the public benefits of the proposals as per NPPF Paragraph 215.

Cromer Windmill – Grade II*

Eighteenth century origin (potentially c1720) post mill with a timber frame and horizontal white weatherboarding carried up over an ogee shaped cap. The setting of the mill has altered due to the busy activity along the A507 and some modern development within the surrounding environment.

The proposal site covers a large area and is therefore located at various distances from the windmill. As a structure, the mill is extremely conspicuous from the southern section of the main body of the proposal site due to the open nature of the landscape, although at this distance, it is not possible to appreciate its significance. However, from the area of the Site at SW1 it was assessed that there would be an appreciation of the significance of the mill from the north and east of this area. It was concluded that the harm to the significance of this built heritage asset would be less than substantial, however at the higher end of that scale.

The less than substantial harm to its setting is agreed with by the LPA. Historic England agree with the Heritage Statement that the development would result in harm that would be 'less than substantial' in terms of the NPPF but would be at the higher end of that category. The less than substantial harm would be weighed against the public benefits of the proposals as per NPPF Paragraph 215.

Broom Farm site - Manor, Barn and Hovel, Farm Outbuildings and Dovecote

These timber frame farm buildings enclose three sides of a farmyard and range in date from the sixteenth to eighteenth centuries. It is the main part of the proposal site that concerns these heritage assets, however it is located at circa 400 metres to their north and there is only some very limited intervisibility between them, mostly between the roofs of the farm buildings and the proposal site. The buildings face south, away from the proposal site, enclosing the farmyard and it is not possible to appreciate their significance from the Site. The proposal site forms a small part of their much wider historic landscape setting only. The harm to their significance would be less than substantial, at the low to very low range of that scale. It was not possible to enter the private grounds of these properties to take views; however from the roadway proximate to this group, it is evident that they are located at considerable distance from the Site and intervisibility from their grounds would be extremely limited.

The LPA state that there would be less than substantial harm to the significance of these heritage assets. No comment from Historic England. The less than substantial harm would be weighed against the public benefits of the proposals as per NPPF Paragraph 215.

The Chequers

This is a timber frame seventeenth century dwelling that has also been utilised as a public house. Part of the proposal site is proximate to Chequers – the south-west corner of SW1 is located at only circa thirty metres from the property and there is some intervisibility between them. However, this intervisibility is limited due to the fact that the house faces east and the field lies to its north-east. The field does form part of the wider historic rural setting of Chequers, however there is no known association between them. It was assessed that the proposal site makes a low contribution to the significance of this built heritage asset. There would be no harm to its significance as a result of the Proposed Development.

The LPA conclude no harm to its significance, no comment from Historic England.

Cromer Hall and Stables

These built heritage assets were able to be scoped out from further assessment due to distance and lack of intervisibility with the proposed development.

The LPA concludes no harm to the significance of Cromer Hall and Stables. No comment from Historic England.

Almin/Manor Farm Cottage and Manor Farm

These built heritage assets were able to be scoped out from further assessment due to distance and lack of intervisibility with the proposed development.

The LPA concludes no harm to the significance of Almin/Manor Farm Cottage and Manor Farm. No comment from Historic England.

Conclusion

There would either be no harm or less than substantial harm to the built heritage assets within the vicinity of the Site. We do not consider further assessment of Scaldsgrove, Cottered Registered Park and Garden and Old Farm Buildings/Barn and Hovel, Broom Farm would be necessary, due to the reasons outlined above. The less than substantial harm found would be weighed against the public benefits of the proposals as per NPPF Paragraph 215.

Kind regards



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for RPS Consulting Services Ltd