



Historic England

Mr David Lamb
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SG13 8EQ

Direct Dial: 01223 582721

Our ref: P01586982

10 January 2025

Dear Mr Lamb

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

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

Thank you for your letter of 8 January 2025 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

This application proposes the development of a solar energy generation facility on farmland in the vicinity of multiple heritage assets. We are concerned by the impact on the setting of the grade II* listed Cromer windmill and consider it would result in harm to the historic significance of the listed building in terms of the National Planning Policy Framework. Removal of one part of proposed development from the application could reduce this, although further information is also needed to fully establish any additional harm which might result from the proposals.

Historic England Advice

This application proposed the development of a solar energy generating facility on farmland to the west of the village of Cottered. While we would defer to the Council's conservation advisors on grade II listed and undesignated heritage assets it falls within the remit of Historic England to advise the Council on highly graded listed buildings, Scheduled Monuments, conservation areas and registered historic parks. In this case the following are within the vicinity of the development site: the park at Garden House in Cottered (a grade II* Registered Park and Garden including



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several listed buildings); the adjoining conservation area at Cottered (which includes the grade I listed parish church of St John the Baptist and the grade I house The Lordship); the site of Cumberlow Manor (Scheduled Monument number 1003551); the grade II* listed Cromer Windmill and Cromer farm house in the village of Cromer.

Cromer windmill is a small early 18th or possibly late 17th century post mill set on a brick base with a fantail on a rotating beam and is raised on a small earthwork mound. It is a very good example of the type, the only post mill surviving in the county and a type relatively rare nationally. It is positioned at the top of high ground which falls away to the west and north. It commands views over these fields looking towards the application site. To the south of the mill is a small group of buildings which form a backdrop, meaning that these views from the west and north are the principal views of the mill in which it can be best appreciated in a landscape context.

The Heritage Statement included with the application (paragraph 4.10) notes that 'the wider setting of the Cromer Windmill consists of an extensive rural landscape...[which] is considered to make a positive contribution to its significance' and mentions the fact that this is 'the wider rural landscape that it would have previously served.' We would agree with this assessment but would expand upon it slightly. The mill is a vernacular building constructed of traditional materials from the region and its place within the farmland from which it took grain to process and which contained the economy and community it supplied is important evidence of those aspects of its significance.

The application site is in two parts, with a smaller southern section closest to the mill. As the Heritage Statement (paragraph 5.3) states 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.' As noted above, this is in fact the chief view of the mill and to fill the field with solar panels would largely remove its character as an arable field and therefore harm the significance of the mill by degrading part of what its setting contributes to that significance. Viewpoint 13 in the photomontage images provided with the application give an indication of the visibility of the proposed development which confirms there would be a visual impact on the mill. In addition, it is unclear if views northward from the mill would also include the larger part of the development site. Part of this might be hidden by a fold in the land but part might be visible. This could also degrade its setting. A further Viewpoint image looking from the mill mound would be valuable in assessing this while another taken to the west of the mill but closer to the southern area of development would also be helpful.

We do not agree with the Heritage Statement's comment that 'it is not possible at this distance [i.e. somewhere within the southern part of the development site] to appreciate its significance'. Even from beyond the edge of the southern part of the application site the listed building's nature as a post-type windmill is evident. Closer views from the centre of this field (which are also in its setting) would reveal more detail. How this is not appreciating the mill's significance is unclear. We also do not see the relevance of the statement that the mill's 'role has changed and it no longer serves this landscape in its former capacity' as this is irrelevant when considering how the setting contributes to its significance when the land use itself is unchanged



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(i.e. it is farmland). Furthermore, with the exception of the improved A507 the roads in this part of the mill's setting are historic routes which actively contribute to an understanding of the building and its landscape, not detract because they now carry motor vehicles as suggested. The existing electricity pylons do detract from the quality of the setting, but crucially do not occupy land in the same way a solar farm would.

Turning to the other designated heritage assets in the remit of Historic England, the potential visual impact of the development on heritage assets is considered in the Heritage Statement. This concludes there would not be a harmful visual impact on Cottered conservation area and Garden House park, Cumberlow Manor and or Cromer farm house. Given distance, topography and intervening planting and building we would agree with this.

We would in the main defer to the Council's archaeological advisors on matters concerning unscheduled archaeology, but we would recommend an archaeological assessment is submitted with the application to support the geophysical report. This should include an understanding of the heritage significance of the designated and undesignated assets' settings including the effect of any development encroachment into the historic demesne of Cumberlow Manor. Beyond this we would make one specific observation on undesignated archaeology. We note that the projected line of a Roman road crosses the south-west corner of the application site. We recommend that this route, with a suitable buffer, be maintained as open ground in any development scheme.

Policy Context

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (paragraph 66.1). Special attention shall also be paid to the desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of any powers under the planning Acts (paragraph 72). In this case we would stress that the windmill is listed at grade II* and so falls within the top 5.8% of listed buildings nationally.

The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to achieve sustainable development and that protection and enhancement of the historic environment is an overarching objective in this (paragraphs 7 and 8). The significance of listed buildings can be harmed or lost by alteration to them or development in their setting. The NPPF states that clear and convincing justification should be made for any such harm and that 'great weight' should be given to the conservation of listed buildings irrespective of the level of harm caused (paragraphs 212 and 213). This weight and the justification for harm should be especially convincing where harm to buildings of a high grade of listing is concerned, as is the case here. Paragraph 219 also states that the Council should favour those proposals for development which preserve those elements of setting that make a positive contribution to the heritage asset or better reveal its significance.



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Historic England Position

We have considered this application in terms of policy and are concerned that development of the application site would result in harm to the significance of the grade II* listed Cromer windmill and not preserve those elements of setting that make a positive contribution to the heritage asset and better reveal its significance in terms of the NPPF, paragraphs 212 and 213. In this we agree with the applicant's Heritage Statement (paragraph 5.3) 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.

Paragraph 215 of the NPPF requires the Council to consider any public benefit which might be delivered by the proposals and weigh this against the harmful impact. We are fully aware of the importance of developing sources of renewable energy and would accept there may be public benefit delivered by the proposals. This is a matter for the Council as required in policy, but we would stress that the harm to the II* listed building would chiefly result from the development of the smaller, southern part of the site. While it has not been established if there would be views of the larger part of the site from the mill, it is clear that deleting this smaller southern element of the scheme would remove much, if not all of the harm. We would therefore express serious concerns about the proposals at this stage and recommend the Council seek a revision of the application to remove the southern area. We would also be interested in the results of further assessment of views northwards from the mill.

Recommendation

Historic England has serious concerns regarding the application on heritage grounds, in particular the harm to the significance of Cromer Windmill which would result from development in its setting. This harm could be much reduced by removing the smaller southern part of the development site from the application, although we would also like to see further information to confirm the possibility of any additional visual impact on views from the mill towards the larger area of development to the north. We would therefore not support the application as it stands but are keen to advise the council further on any amendments and additional information.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 7, 8, 212, 213 and 219 of the NPPF. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely



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