

November 2024

Heritage Statement

Morley Way, Wimblington

<i>Project number: 24.121</i>		
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1.0 Introduction

- 1.1. This Heritage Statement has been prepared on behalf of the Applicant to accompany the submission of a planning application for the erection of five homes, with access from Morley Way, landscaping and associated infrastructure. The site is located to the south of Morley Way, Wimblington, March.
- 1.2. The Site is adjacent to Grade II listed 31, Norfolk Street.
- 1.3. The purpose of this Heritage Statement is to describe the heritage significance of those assets potentially affected by the proposed development and assess the heritage impact. It has been informed by desk-top research and a site visit made on 2nd October 2024.
- 1.4. The scope of this report deals only with the above-ground heritage constraints.

2.0 Site Context

Heritage designations

- 2.1. Heritage assets are defined in Annex 2 of the National Planning Policy Framework (NPPF) (2023) as:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decision, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).

- 2.2. The Site is located adjacent to several designated heritage assets. A site visit and initial background research has confirmed that very few of these assets would have the potential to be impacted by the proposals by virtue of the separation distance, intervening built form, landscape and vegetation features and the nature of these assets. As such only Grade II listed 31 Norfolk Street (NHLE 1126585) will be taken forward for assessment.

- 2.3. The restricted scope of designated heritage assets considered to be potentially affected is supported by the Conservation Officer's comments on the previous withdrawn application on the Site (ref.: F/YR24/0051/F).

Non-designated heritage designations

- 2.4. Fenland District Council does not yet have an adopted Local Heritage List of non-designated heritage assets. There are currently no buildings or structures nominated within the village for the Cambridgeshire's Local Heritage



Fig. 1. Heritage asset plan. Listed buildings marked in blue, and the Site outlined in white.
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List. There were also none identified through the previous application (ref.: F/YR24/0051/F).

identified in the previous application.

- 2.5. An online search of the Cambridgeshire Historic Environment Record via Heritage Gateway did not identify any assets that would have the potential to be impacted by the development proposals. None have been

3.0 Legislation, Policies and Guidance

3.1. This section sets out a summary of the core heritage decision-making framework. It is not intended to be exhaustive.

Legislation

3.2. The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes powers to designate listed buildings and conservation areas together with a statutory duty to consider the impacts of proposed development in the determination of planning applications.

3.3. Section 1 makes provision for the Secretary of State to compile lists of buildings of special architectural or historic interest. Section 5 defines a 'listed building' to include any object or structure fixed to the building, and any object or structure within the curtilage of the building which forms part of the land and has done so since before 1st July 1948.

3.4. Section 16 requires local planning authorities to 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 when considering whether to grant applications for listed building consent.

3.5. Section 66 establishes a duty with respect to the determination of planning applications. In considering whether to grant planning permission which affects a listed building or its setting, local planning authorities 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.

3.6. Section 69 of the Act establishes powers for local planning authorities to designate areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance as conservation areas.

3.7. Section 72 establishes a general duty in the exercise of planning functions with respect to any buildings or other land within a conservation area to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

3.8. Scheduled Monuments are statutorily protected through the Ancient Monument and Archaeological Act 1979. The setting of Scheduled Monuments are protected through local and national planning policy.

Local Plan

3.9. The Development Plan comprises the Fenland Local Plan (2014), Cambridgeshire and Peterborough Minerals and Waste Plan (2021) and 'made' Neighbourhood Plans.

3.10. The principal historic environment policy is LP18 The Historic Environment of the Fenland Local Plan (2014), which reads as follows:

The Council will protect, conserve and seek opportunities to enhance the historic environment throughout Fenland. This will be achieved through

- *the consideration of applications for*

planning permission and listed building consent;

- *the use of planning obligations to secure the enhancement of the significance of any heritage asset,*
- *where development might impact on that significance (including impact on setting);*
- *keeping up-to-date and implementing conservation area appraisals and management plans, and*
- *using such up to date information in the determination of planning applications;*
- *making use of Article 4 Directions, where appropriate, to prevent unsympathetic alterations to buildings in conservation areas;*
- *the preparation and maintenance of a list of buildings and other heritage assets of local importance;*
- *steps to reduce the number of heritage assets in Fenland on English Heritage's Heritage at Risk Register; and*
- *the use of grant schemes, as resources permit, to safeguard heritage assets at risk and encourage sympathetic maintenance and restoration of listed buildings and historic shop fronts.*

All development proposals that would affect any designated or undesignated heritage asset will

be required to:

(a) describe and assess the significance of the asset and/or its setting to determine its architectural, historic or archaeological interest; and

(b) identify the impact of the proposed works on the special character of the asset; and

(c) provide a clear justification for the works, especially if these would harm the asset or its setting, so that the harm can be weighed against public benefits.

The level of detail required should be proportionate to the asset's importance and sufficient to understand the potential impact of the proposal on its significance and/or setting.

All development proposals that would affect a heritage asset will be determined in accordance with local policy in this Plan and national policy in the National Planning Policy Framework. Where permission is granted, a programme of work and/or the implementation of any necessary mitigation measures may be secured by condition or as part of a planning obligation in order to minimise any adverse impact.

National Planning Policy

3.11. National planning policy is established in the National Planning Policy Framework (NPPF) (2023). Chapter 16 (paragraphs 195-214) sets out policy guidance for development affecting the historic environment.

3.12. Paragraph 195 recognises that heritage assets

are an irreplaceable resource and should be conserved in a manner that is appropriate to their significance such that they can be enjoyed by existing and future generations.

3.13. Paragraph 200 requires applicants to describe the heritage significance of any heritage assets affected by a proposed development, including the contribution made by their setting. This should be proportionate to the assets' importance, and no more than is required to understand the potential nature of the impact on that significance. Paragraph 196 requires local planning authorities to assess the significance of any heritage assets potentially affected to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposed development.

3.14. Paragraph 203 states that in determining planning applications, local planning authorities should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities; and the desirability of new development making a positive contribution to local character and distinctiveness.

3.15. Paragraphs 205 onwards provide guidance for considering the potential impacts. Paragraph 199 states that when considering the impact of a proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation. This should be proportionate to its significance, the more important the asset, the greater the weight

should be. This is irrespective of whether the harm is substantial, total loss, or less than substantial.

3.16. Paragraph 206 goes on to state that any harm to, or loss of, the significance of a designated heritage asset, including through development within its setting, should require clear and convincing justification.

3.17. Paragraphs 206 and 207 deal with instances of substantial harm to a designated heritage asset. Development causing substantial harm should be refused unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh the harm or loss, or other criteria are met. Paragraph 208 guides that where a development would lead to less than substantial harm to a designated heritage asset, the harm should be weighed against the public benefits of the proposal, including where appropriate, securing its optimum viable use.

3.18. Paragraph 209 deals with non-designated heritage assets. It guides that the effect on the significance of a non-designated heritage asset should be taken in to account. A balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

3.19. Paragraph 212 encourages local planning authorities to look for opportunities for new development within conservation areas and the setting of heritage assets to enhance or better reveal their significance. Those proposals that preserve elements of the setting that make a positive contribution to

the asset should be treated favourably.

Guidance and Best Practice

- 3.20. Interpretation of the NPPF is provided by the Planning Practice Guidance (PPG). This is a digital guidance note divided into a series of chapters which is subject to regular review; the historic environment chapter was last updated in July 2019.
- 3.21. The historic environment chapter guides that understanding the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm (paragraph 8). Paragraph 13 provides further guidance on setting, making clear that setting is not only related to visual attributes but other environmental factors such as noise, dust, smell and vibration as well as the relationship between places.
- 3.22. Paragraph 15 recognises that sustaining heritage assets in private hands often requires an incentive for their active conservation. It goes on to note that putting heritage assets to a viable use is likely to lead to investment in their maintenance and thereby support their long-term conservation. It goes on to state that harmful development may sometimes be justified in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and provided the harm is minimised.
- 3.23. Paragraph 18 provides guidance on assessing harm. It is clear that proposed development may have no impact or may enhance an asset's significance such that no harm is caused.

Where development would be harmful to a designated heritage asset, this needs to be categorised as either 'less than substantial' or 'substantial' harm. The level of harm can vary within these two categories. It goes to elaborate that substantial harm is a 'high test' and therefore is unlikely to arise in many cases. This harm may arise from works to the asset or from development within its setting.

- 3.24. Historic England has produced a series of best practice guidance notes to assist in the identification of assets, assessing significance and managing change. Those of particular relevance include:
- Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (2008)
 - Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2 (2015)
 - The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) (2017)
 - Statements of Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12 (2019)

4.0 Brief History and Statement of Significance

Brief history of the Site and surrounding area

- 4.1. The Site is located within the village of Wimblington to the south of Morley Way. The village historically formed a hamlet of the larger parish of Doddington. It became a separate parish in 1874 with a new church opening the same year.
- 4.2. The Tithe Map dating to 1840 depicts the village, and shows that the Site appears to partially fall across two land parcels labelled 506 and 511. 506 is shown partially divided by a dotted line from the property to the north of it, this is 31 Norfolk Street. It is labelled as a "Close" in the apportionment. Land parcel 511 is labelled as a "Millfield" within the apportionment. Both areas are noted in the apportionment as being owned by John Horsey Waddington Esquire and occupied by John Eaton who also both own and occupy plot 507 which is a "Close" attached to 31 Norfolk Street.
- 4.3. The surrounding village is shown with built form constructed in a linear pattern along the main roads of the village that stem from the "Turnpike Road". The wider area is shown divided into parcels of land.
- 4.4. The Ordnance Survey (OS) map dated 1887 depicts the Site as part of an open area of an 'L' shaped field on the edge of the main village development. Plots 511 and 506 from the Tithe Map appear as one.
- 4.5. The map shows an increase of built form throughout the village, focussed on the High Street, Fullers Lane and Addison Road.



Fig. 2 Tithe Map, published 1840. Site outlined in blue. Accessed via The Genealogist, 23.10.24.



Fig. 3 Ordnance Survey Map, surveyed 1886 and published 1887, accessed via National Library of Scotland, 23.10.24. Site outlined in blue.

- 4.6. There is little change to the Site or surrounding area in the 1902 OS Map. The OS Map published in 1926 highlights the continued development

of the surrounding area. A row of terraced housing is shown immediately south of 31 Norfolk Street, occupying part of its former plot (as depicted on earlier maps). The plot of 31 Norfolk Street is features a small area to the rear and immediately north and east of the property. Its primary amenity spaces has historically been focussed to the east. The map also captures the continued linear development within the core of the village and also to the west along March Road.

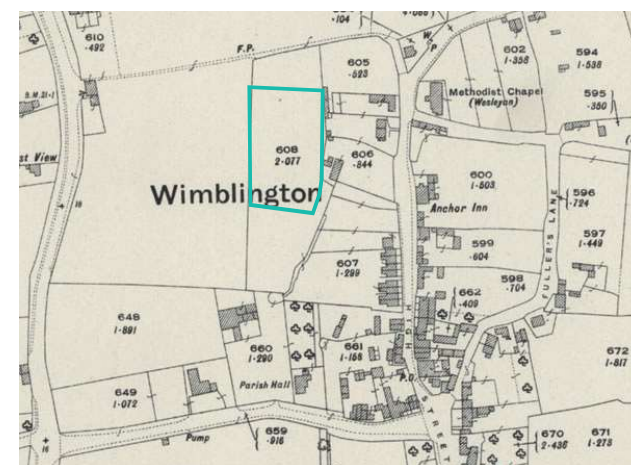


Fig. 4 Ordnance Survey Map, surveyed 1925 and published 1926, accessed via National Library of Scotland, 23.10.24. Site outlined in blue.

- 4.7. The OS Map published in 1952 shows the character of the Site unchanged, appearing as part of an enclosed field. The map also depicts the continued development of the village, built form is now more frequent along March Road to the west of the Site and King Street to the north-east.

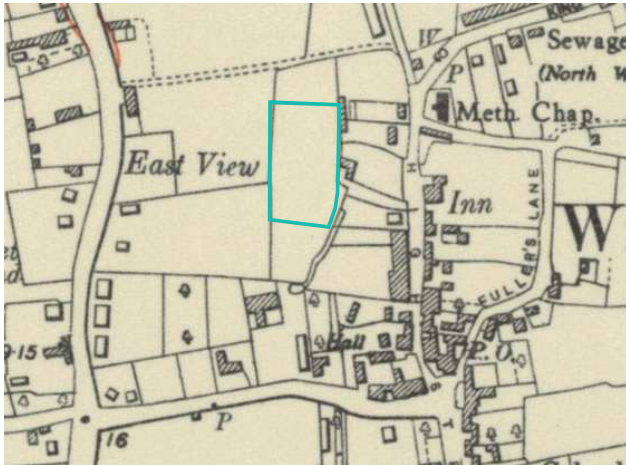


Fig. 5 Ordnance Survey Map, surveyed 1950 and published 1952, accessed via National Library of Scotland, 23.10.24.



Fig. 6 Historic England Aerial View, RAF/543/2409, flown 16 September 1963, accessed via Historic England, 23.10.24.

4.8. An aerial view was taken of the Site in 1963, shows the amalgamation of the Site with a parcel of land to the north and north-west and the loss of historic field boundaries with the amalgamation of smaller fields. The start of the Eaton Estate residential development can be seen to the north-east of the Site, highlighting the gradual expansion of the village.

4.9. The OS Map published in 1983 depicts the Site as part of an upside down 'L' shape, combined with the parcel to the north-west. To the south of the Site are a series of buildings which are thought to be part of a yard of agricultural buildings. The map depicts the increased development around Eaton Estate to the north-east and more centrally within the village,



Fig. 7 Ordnance Survey Map, published 1983, accessed via Promap, 23.10.24.

east of Norfolk Street. This new development comprises a mix of built form, however much of this is single storey bungalows. The map also depicts industrial development to the south-west of the Site, west of March Road.

4.10. An aerial view of the Site taken in 1999 continues to depict the Site as part of the 'L' shaped field. It is shown predominantly grassed, to the south, where there is access from Addison Road, is a yard with agricultural /storage buildings.



Fig. 8 Aerial Image of the Site, taken in 1999, accessed via Google Earth, 23.10.24. Site outlined in blue.

4.11. An aerial view from 2003 depicts the division of the Site from the parcel to the north-west which has been developed. The Site is shown as a cleared yard area with very little greenery. The building from the previous view still appears on the map to the south of the Site. The image also depicts extensive change to the north of the Site through the development of bungalows on Morley Way.



Fig. 9 Aerial Image of the Site, taken in 2003, accessed via Google Earth, 23.10.24. Site outlined in blue.

The area immediately to the north of the Site is shown with built form, perhaps relating to the construction of the Morley Way development.

4.12. The 2007 aerial view depicts the completion of the Morley Way site which provides access to the Site from the north. The Site itself is shown as a grassed area of land associated with the buildings to the south, forming a yard. The Site is shown surrounded by residential development.

4.13. The aerial views of the Site depict the built form to the south of the Site until 2021 when some of the buildings closer to the Site were demolished. In these images, whilst grassed, the Site appears as part of the yard.

4.14. Today, the Site comprises a small enclosed parcel of grassed land surrounded by residential development.



Fig. 10 Aerial Image of the Site, taken in 2007, accessed via Google Earth, 23.10.24. Site outlined in blue.



Fig. 11 Aerial Image of the Site, taken in 2024, accessed via Google Earth, 23.10.24. Site outlined in blue.

Statement of significance

Introduction

4.15. Determining significance is a professional judgement taking into account the designation status, desk-top research and fieldwork. The assessment should seek to understand the nature, extent and level of significance, and should be proportionate to the relative importance of the asset (Historic England, 'Managing Significance in Decision-Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning: 2' [2015] p. 2.)

4.16. Annex 2 of the NPPF defines significance as 'the value of a heritage asset to this and future generations because of its heritage interest'. This interest may be archaeological, architectural, artistic or historic. An understanding of significance must therefore derive from the heritage interest/s of the heritage asset.

4.17. The 'Historic environment' chapter of the PPG provides a definition for these interests as follows (Paragraph: 006):

- *archaeological interest: As defined in the Glossary to the National Planning Policy Framework, 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 skill, 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.*

- 4.18. Significance derives not only from the heritage interests of the asset itself, but also from the contribution made by its setting. The setting of a heritage asset is defined in Annex 2 of the NPPF 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. 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.

31 Norfolk Street

- 4.19. The asset was first listed at Grade II in February 1985. It was built in the late 18th/ early 19th

century, constructed in red and gault brick with a long straw thatched roof. The building is of a single storey with an attic and features end stacks. It is an 'L' shaped building and the cartographic evidence suggests it was originally a rectangular form parallel to the road and then later extended in the early 20th century with a rear wing. The planning history also indicates a two storey extension was approved in 1988 (ref.: F/1320/87/LB).

- 4.20. There are simplistic vernacular features including the glazed front door, three-light windows in segmental brick arches and dormer windows with leaded lights. Architecturally, the building is distinctly vernacular, employing typical and local materials and techniques of the period in its design, and as such it has moderate architectural interest.

- 4.21. There are also moderate levels of historic interest in the asset as one of the earlier surviving houses within the village which can help us to understand its historic development and common construction techniques from the time.

Setting

- 4.22. The asset is located on the west side of Norfolk Street, set towards the rear of a large plot. The original range of the building is parallel to the road with the extension perpendicular to the main range extending towards the rear. Adjacent to the house is a double garage constructed in the late 20th century. The house and garage are immediately surrounded by a gravelled area to provide parking and access, the gravelled drive extends to the road.

- 4.23. To the rear is a small garden, contained by a

fence and large hedge. To the front, there is a larger private garden extending to the public highway and surrounded by a tall hedge. These features to both the front and rear of the property help to create a distinctly domestic and enclosed character to the private residence. Given the position of the house and intervening vegetation, there are limited views of the house from Norfolk Street, further enforcing this private character.

- 4.24. Beyond its private curtilage, the asset has a residential setting, defined by its location in the centre of the village, surrounded by a range of built form varying in date and style. The cartographic evidence has shown how the setting of the asset has changed significantly over time through the continued expansion of Wimblington and infilling of development, on all sides of the asset. It also demonstrated the changes to ownership and plot size of the asset over time which whilst still large today, has considerably decreased from its 19th century form. Whilst the asset once experienced a



Fig. 12 31 Norfolk Street viewed from the Site, taken 02.10.24.



Fig. 13 31 Norfolk Street viewed from the Norfolk Street into the plot, taken 02.10.24.

more open agricultural character to the west this has since changed through the 20th century.

4.25. The Site is located to the west of the asset. It is a small parcel of land which is currently grassed but historically has been used as a yard through the 20th century, associated with buildings to the south (Fig. 14). The Site is divided from the asset by a boarded fence and tall, well-established hedgerow.

4.26. The Site appears to have once formed part of the land parcel associated with 31 Norfolk Street, sharing both owner and occupier on the Tithe Map. However, the cartographic evidence demonstrates that the majority of the Site was within land parcel 511 (Millfield) on the Tithe Map rather than directly associated to 31 Norfolk Street. As such, the majority of the plot has always been separate. Furthermore, there is no evidence within the historic

record to suggest that 31 Norfolk Street had a direct functional connection with the Site such as grazing land or farmland. The Site is described as a "Close" and "Millfield" in the Tithe apportionment.

4.27. As set out within the history of the Site, the area surrounding 31 Norfolk Street has changed significantly throughout the second half of the 20th century through residential expansion in the area. The outlook of 31 Norfolk Street to the west would once have been more open land, including the Site, this is now more clearly defined by surrounding residential development. Given the context of the Site today, it provides a positive contribution to the asset by virtue of its open character, however, the ability to understand the asset within an agricultural, rural context is much changed, limiting the contribution of the Site.

4.28. Given the proximity between the Site and the asset, there are views between the two. From the Site, the rear of the asset is partially visible over the fence and hedge which form its western boundary, dividing it from the Site. This view is primarily of the more recent extension and lesser significant rear elevation.

4.29. There are no designed views between the site and the listed building. The property is clearly orientated towards the east and this has historically formed its primary amenity space; any functional connection with the land to the west which encompasses the site has been separate to the domestic usage of the cottage, as evidenced by the form and orientation of the property which 'turns its back' to the land to the west.



Fig. 14 The yard character to the south of the Site, taken 02.10.24.



Fig. 15 Taken towards the south of the Site looking north, 31 Norfolk Street visible on the right of the image, taken 02.10.24.

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- 4.30. From outside 31 Norfolk Street, standing on the public footpath, there are no views towards the Site. From this location, there are also no views of the Site seen in conjunction with the asset.
- 4.31. Access was not obtained to 31 Norfolk Street which is a private property. Given the height of the fence and hedgerow (which are above 6ft), it can be assumed that there will be limited views from the asset looking towards the Site, limited to those from upper floors. This accentuates that the property is purposefully excluding views of the Site and there is no direct visual relationship between the two, and never has been.

5.0 Heritage Impact Assessment

Planning History

- 5.1. The Site has been the subject of a previous planning application, validated in January 2024 (ref.: F/YR24/0051/F) which proposed to “Erect 8 dwellings (2 x single storey, 2 bed and 6 x single storey, 3 bed) with associated garages and the formation of an attenuation pond”. The application was withdrawn in July 2024.



Fig. 16 Previous Proposed site layout for application F/YR24/0051/F, produced December 2023. Produced by L Bevens Associates Architects Ltd.

- 5.2. In relation to the scheme, the Conservation Officer provided the following commentary (comments dated 20.02.24):

“The site forms a paddock/grazing land which has historically been the edge of settlement/commencement of the open countryside to the rear of Norfolk Street and Addison Road. It therefore reflects and represents a last link to the agricultural landscape setting of Norfolk Street and the setting the Listed Building (31 Norfolk Street) enjoys.

Development here would represent a cumulative detrimental impact to the setting of the listed building (31 Norfolk Street) the principal of which is considered harmful.”

- 5.3. The comments acknowledged the 20th century changes to its setting including the impact of Morley Way and changes along Norfolk Street, however concluded that there was a potential cumulative impact.
- 5.4. The comments suggest there are vantage points along Norfolk Street in which the dwellings would be visible. Particular concerns were raised in relation to the submitted plots 3 and 4 and their visibility from the street. There were also concerns raised in relation to Plots 1 and 2 and views from Morley Way towards 31 Norfolk Street being obstructed.
- 5.5. The conclusion was as follows:

“I am of the view that the loss off one of the last remaining parcels of open land on the edge of the historic parts of the settlement will have a considerable impact on the setting of the GII listed 31 Norfolk Street. This is an in-principle objection to the loss of this grazing land.

The development results in less than substantial harm (medium) to the identified

heritage assets, for which national and local heritage policy and guidance points to a presumption against Councils supporting such development, unless there are strong public benefits which outweigh the harm identified.

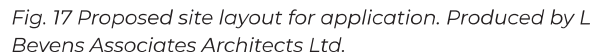
Furthermore, the heritage statement that is a requirement of both the NPPF and the Local Plan does not satisfactorily assess the impacts upon the setting of the GII listed building that is approx. 14.3m from the proposed plots 3 and 4 and views from the Morley Way public realm. The statement concludes ‘that appropriate measures have been taken with the proposed site layout to minimise the impact on the Listed Building’. It is not clear what these measures are. The statement is therefore fails to assess the relationship and impacts of this development on designated heritage assets.”

- 5.6. The proposals were amended following these comments, however the amendments were not considered to be material and the objection from the conservation officer remained.

Proposed development

- 5.7. The proposed scheme has been fully reconsidered in response to the conservation officer comments. A key change has been the reduction of the number of units on the site to 5 no. dwellings, with access from Morley Way, including landscaping and associated infrastructure.
- 5.8. The access road of the development will continue from Morley Way along the western boundary of the Site. Five single storey 3 bed

5.9. There will be an attenuation pond to the



5.10. A number of amendments have been made to the proposals to address concerns with the previous scheme identified in the conservation officer's comments. These include:

- 5.13.

Taking into consideration the comments on the previous application, the positioning and layout of development has been located towards the western boundary of the Site. The proposed dwellings are generously-spaced within individual plots with large areas to the rear (east) of the dwellings. This helps to create a greater separation between the built form proposed and 31 Norfolk Street. The intervening distance will be utilised as private garden space which will retain an open element to the character of the Site. The density of the development is responsive to its surroundings and incorporates the village development character.

Impact on 31 Norfolk Street

- 5.14.

5.15.

16

Street. It highlights the preservation of the green character of the Site towards the rear of the proposed properties in closest proximity to the asset.

provision of additional native vegetation throughout, particularly to the north, south-east and western boundaries. This reflects the green character of the Site and this area of the village.

5.16. The proposals will be enhanced by the



Fig. 18 Photomontage of the proposed development. Produced by L Bevens Associates Architects Ltd.



Fig. 19 Garage of 31 Norfolk Street. The style is replicated in the garages of the proposed design.

- 5.17. The materials and design of the proposed dwellings have been chosen to create variety within the Site, whilst also drawing inspiration from the existing built form within the local area. This references and connects to the existing village character ensuring the development works coherently with the neighbouring Morley Way and also more widely within the historic settlement.
- 5.18. The design of the dwellings takes a traditional approach. There are design features such as a keystone which reference the local character. The gables of the proposed dwellings respond to the gabled form of many of the properties in the surrounding area including 31 Norfolk Street.



Fig. 20 House on March Road. The style of stone keystones and materials are replicated in the proposed dwellings.

5.19. The conservation officer comments from the previous application raised concerns about viewpoints towards the Site from Norfolk Street. Images were included within the comments however it must be noted these are not taken from the public highway in Norfolk Street but rather within the curtilage of 31 Norfolk Street. The views over the fence towards the Site have also been taken at an elevated position. A site visit has confirmed that there will be limited to no visibility of the Site from Norfolk Street itself as a result of the dense vegetation and boundary treatment of

the property. There are currently no publicly accessible views on Norfolk Street in which the Site can be currently appreciated alongside 31 Norfolk Street. Therefore, given the limited height of the proposed dwellings, there will be limited if any views of the proposed dwellings from Norfolk Street.



Fig. 21 View of the asset from Norfolk Street, taken 02.10.24.



Fig. 22 View of the asset from Norfolk Street, taken 02.10.24.

5.20. In addition, the site visit also confirmed the lack of visibility of 31 Norfolk Street from the end of Morley Way, another view point referred to by the conservation officer. In its current form, there are glimpsed views of 31 Norfolk Street over the top of the fence and beyond the mature vegetation. Through the positioning of built form within the proposals, these views will be retained.



Fig. 23 View from the green at Morley Way towards the Site and 31 Norfolk Street (outlined in blue), taken 02.10.24.

5.21. Irrespective of views, the proposals will introduce additional built form within proximity of the identified heritage asset. However, the site is currently appreciated in the context of the surrounding residential and bungalow development and it is much changed from its historic more rural character. The Site provides a limited contribution to how the asset is experienced. Through the careful consideration of design, massing, layout, landscaping and materials, the proposed development is considered to preserve the setting of 31 Norfolk Street.

6.0 Conclusions

- 6.1. This Heritage Statement has been produced to accompany the planning application for the erection of five single storey dwellings with associated landscaping and infrastructure at land to the south of Morley Way.
- 6.2. The previous sections of the report have demonstrated that this scheme will not result in an adverse impact on the setting of 31 Norfolk Street.
- 6.3. The proposals have taken into consideration comments made on the previously withdrawn scheme to ensure the proposed built form better responds to the setting of the asset through a more traditional layout of development, aligned along the western edge of the site and set away from the listed building. Key views will be preserved, and the new homes are appropriate in scale, massing and design details
- 6.4. The proposals represent an opportunity to deliver residential development which reflects the green, rural character of the village in a sensitive manner. In line with the objectives of para 203 of the NPPF, the development has responded to the local character and distinctiveness of the village.
- 6.5. The proposals are also considered to be in accordance with LP18 The Historic Environment of the Fenland Local Plan, in addition to the policy tests set out in the 1990 Act and Chapter 16 of the NPPF.

CONSERVATION REFERRAL COMMENTS

Application Ref: F/YR24/1000/F

Address: Land West Of 27 Norfolk Street Wimblington Cambridgeshire

DC Case Officer: T Donnelly

Conservation Officer: S Falco

Date: 13/02/2025

Proposal:

Erect 5 dwellings with associated garages and the formation of an attenuation pond

Considerations:

1. Consideration is given to the impact of the proposal on the architectural and historic interests with special regard paid to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which it possesses according to the duty in law under S16 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
2. Consideration is given to the impact of the proposal on the architectural and historic interests of Non-Designated Heritage Assets with special regard paid to the desirability of preserving the building *or its setting* or any features of special architectural or historic interest which it possesses.
3. Due regard is given to relevant planning history.
4. Comments are made with due regard to Section 16 of the National Planning Policy Framework, 2023, specifically, paragraphs 201, 203, 205, 206, and 208.

Revised Application F/YR24/1000/F:

Erect 5 dwellings with associated garages and the formation of an attenuation pond.

The previous application was withdrawn and has been resubmitted under current planning ref: F/YR24/1000/F for a reduced number of dwellings of 5 in number rather than 8.

Rather than two lines of dwellings with a roadway through the centre of the site, the proposal is for a single line of dwellings with the roadway to the far west of the site.

The result of this revision is that the site is being less intensively developed with greater distances between the proposed and the GII listed cottage known as 27 Norfolk Street. However, results in the effect of a wall of development in the backdrop of the listed building, which changes its setting from one of open countryside to that of residential development.

The historic maps below show the listed building and the open agrarian landscape setting it has benefitted from and had a very strong relationship with historically. The open setting allows the building to be appreciated within its historic context.



Fig 1: Early C20 map of area



Fig 2: Early C20 map of area

The setting has changed somewhat in the C20 whereby the listed building no longer stands isolated, with C20 dwellings fronting Norfolk Street now flanking the listed building, however, 31 Norfolk Street (GII) still retains a spacious plot and its contextual setting with Norfolk Street and the open grazing land to the rear (the development site).

The modern housing development of Morley Way, has had some impact on the wider setting and appreciation of both 31 Norfolk Street and Addison House, by changing the historic morphology of the settlement and how these historic buildings are understood in their context, however, this is more distant than the current proposal where those setting impacts would be directly behind and therefore magnifying the impact.

Historic England guidance on setting states that you should consider the effect of cumulative impact on setting: "Cumulative change, where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting" (p4 of *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)*).

There has previously been and remains an in-principal objection to the loss of this historic area of paddock / grazing land to development, which benefits the setting of a number of nearby heritage assets and the general historic settlement layout and its agrarian land uses.

The opinion that this historically important undeveloped land should not be developed with piecemeal residential encroachment is consistent with the views of the previous conservation officer who commented the following on an adjacent application relating to the redevelopment of the farmyard to the south under app ref:

'Therefore, when a full planning permission application comes forward the development should be clearly designed to fall within the existing yard and in such a way, as to not allow for the possibility of further development (for example, linking up with Morley Way) as this kind of piecemeal development would affect the ability to appreciate the significance of the nearby listed buildings'.

It should be noted that there are vantage points from the front of 27 Norfolk Street and from the rear of the listed building. The proposed dwellings, despite their greater distance from the listed building would remain visible in the backdrop of these views and intrude on the appreciation of the listed building which at present is appreciated with no development in the backdrop, for which it has benefitted from historically. A considerable amount of its significance is derived from a rural cottage with open land surrounding it. As a result of this development, that setting and significance will be impacted upon.



Fig 3: Yellow arrows denoting views from curtilage of GII listed Building (31 Norfolk Street) to proposed plots 2, 3 and 4 which are of comparable height to Listed Building. Red arrows denote current views from the public realm of Morley Way where the listed building is appreciated from the rear in context with the historic open landscape of the grazing land to the rear.

This gives rise to a strong objection as to the impact the development will have upon the setting and historical associations of 31 Norfolk Street with the open countryside.

The proposed dwellings are considered to be of comparable height to the existing listed building and the ground levels of the proposed development site is noticeably higher than the ground levels of the listed building. As such, the presence of the proposed development (taking into consideration their respective heights), are considered to unacceptably intrude on and clutter the surroundings and backdrop of the listed building and impact detrimentally on its setting and its appreciation in views towards it from various vantage points.



Fig 4: Views through to the development site and proposed dwellings in close proximity



Fig 5: Views through to the development site and proposed dwellings in proximity



Fig 6: Views through to the development site and proposed dwellings in close proximity



Fig 7: View towards development site within garden of Listed Building. The presence of modern development from the garden would impact on setting also



Fig 8: View along shared boundary of Listed Building and Proposed Development showing very close proximity

Conclusion:

I am of the view that the loss off one of the last remaining parcels of open land on the edge of the historic parts of the settlement will have a considerable impact on the setting of the GII listed 31 Norfolk Street. This is an in-principle objection to the loss of this grazing land.

The setting of the LB is currently that of a building sat within its spacious grounds with a verdant and spacious field setting in the backdrop, as it has benefitted from historically. The change to this setting would be considerable and alter the context that the Listed building is appreciated and understood.

The development results in less than substantial harm (medium) to the identified heritage assets, for which national and local heritage policy and guidance points to a presumption against Councils supporting such development, unless there are strong public benefits which outweigh the harm identified.

RECCOMENDATION: Objection - Refuse

Heritage Rebuttal

"Erect 5 dwellings with associated garages and the formation of an attenuation pond" at the Land West of 27 Norfolk Street, accessed from Morley Way (ref.: F/YR24/1000/F)

Project Number: 24.121
Version: 1
Date Issued: March 2025
Author: Emma Healey IHBC AssocRTPI, reviewed by Jenni Mason IHBC

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1.0 Introduction

- 1.1. This Heritage Rebuttal has been prepared on behalf of the applicant to support the live application (ref.: F/YR24/1000/F) relating to the Land West of 27 Norfolk Street, accessed from Morley Way to *"Erect 5 dwellings with associated garages and the formation of an attenuation pond"*.
- 1.2. The Site comprises a small enclosed parcel of grassed land surrounded by residential development. The only heritage asset deemed to have the potential to be impacted by the proposals is Grade II listed 31 Norfolk Street (NHLE 1126585). This has been established by the Conservation Officer's comments on the previous withdrawn application on the Site (ref.: F/YR24/0051/F).
- 1.3. As part of the formal consultation for this application, comments were received by the Conservation Officer for Fenland District Council who has objected to the proposals stating that: *"The development results in less than substantial harm (medium) to the identified heritage assets, for which national and local heritage policy and guidance points to a presumption against Councils supporting such development, unless there are strong public benefits which outweigh the harm identified."* The detailed comments raise concerns in relation to the setting of 31 Norfolk Street, specifically the loss of one of the last remaining parcels of open land (misunderstood to be grazing land) on the edge of the historic settlement and the loss of the *"verdant and spacious field setting in the backdrop"* of 31 Norfolk Street.
- 1.4. This rebuttal has been specifically written in reference to these comments, providing additional assessment of these issues. It should be read in conjunction with the submitted Heritage Statement which sets out the baseline and heritage impact assessment in more detail.
- 1.5. Whilst it is recognised that the National Planning Policy Framework has been updated following the submission of the application, the content within the Chapter 16 relating to heritage has not changed and therefore the amended numbering has not been repeated here for reasons of brevity.
- 1.6. This note will summarise the heritage baseline before considering the concerns raised by the conservation officer in turn.

2.0 Heritage Baseline

- 2.1. The Heritage Statement set out a statement of significance of 31 Norfolk Street and a detailed history of the Site including a map regression which will not be repeated fully here but referenced to aid in the discussion of the conservation officer's comments.
- 2.2. The conservation officer's comments state: *"The historic maps below show the listed building and the open agrarian landscape setting it has benefited from and had a very strong relationship with historically. The open setting allows the building to be appreciated within its historic context."* The maps reproduced in the Conservation Officer's comments are dated by them to the early 20th century; the National Library of Scotland confirms they date from 1903 and 1887 respectively.
- 2.3. Whilst it is acknowledged these maps show the listed building within a more open setting, they show a snapshot in time of a much smaller village that has changed significantly over the last century. This is partially acknowledged in the comments which state: *"The setting has changed somewhat in the C20 whereby the listed building no longer stands isolated, with C20 dwellings fronting Norfolk Street now flanking the listed building, however, 31 Norfolk Street (GII) still retains a spacious plot and its contextual setting with Norfolk Street and the open grazing land to the rear (the development site)." There are also continued references throughout the comments to the asset being set within "open countryside".*
- 2.4. As set out within the Heritage Statement, there is no evidence within the historic record to suggest that 31 Norfolk Street had a direct functional connection with the Site such as grazing land or farmland. The Site is described as a *"Close"* and *"Millfield"* in the Tithe apportionment. The aerial views combined with the map evidence help to showcase the changing setting of 31 Norfolk Street as the village developed through the 20th century, particularly evident along Norfolk Street and March Road to the rear of 31 Norfolk Street and the Site where a line of development formed. By the early 2000s, the aerial views

depict both the Site and 31 Norfolk Street largely surrounded by residential development. The Site itself is also shown as a cleared yard with no vegetation in the aerial images. Historically and today, the Site is not known to have ever been grazing land. The asset is not located within open countryside or on the edge of the village but surrounded by residential development in the heart of the village. The Tithe and OS maps clearly show development (albeit limited) along the road to the west, demonstrating that historically this asset has never been at the edge of the village.

- 2.5. The conservation officer's comments on the asset being located within a "*spacious plot*". The map regression within the Heritage Statement highlighted that the plot of 31 Norfolk Street has historically only extended very minimally to the rear (west) on the boundary of the site, with a slightly larger extent to the north, but its grounds primarily extend to the east, towards Norfolk Street. The property is clearly orientated towards the east and this has historically formed its primary amenity space; any functional connection with the land to the west which encompasses the site has been separate to the domestic usage of the cottage, as evidenced by the form and orientation of the property which 'turns its back' to the land to the west.
- 2.6. The comments state: "*...this historic area of paddock / grazing land ... benefits the setting of a number of nearby heritage assets and the general historic settlement layout and its agrarian land uses.*" There is particular mention of Grade II listed Addison House which is located to the south of the Site. Addison House has historically been separated by intervening built form, as shown on the historic maps within the Heritage Statement and indeed the two maps used within the conservation officer's comments. In addition to this, the consented scheme for eight dwellings (ref.: F/YR21/1055/O) will be constructed in between this asset and the Site, clearly removing any contribution the site may have possibly made to the wider setting of Addison House. For these reasons, it is not considered that this parcel of land contributes to our appreciation and understanding of Addison House.
- 2.7. It is considered that the conservation officer has given undue weight to the contribution the Site makes to the setting of 31 Norfolk Street and has failed to acknowledge the current setting the asset is experienced in is one of residential built form.

3.0 Heritage Impact Assessment and Conclusions

Heritage Impact Assessment

- 3.1. The conservation officer's comments acknowledge the amendments made from the previously submitted scheme: "*Rather than two lines of dwellings with a roadway through the centre of the site, the proposal is for a single line of dwellings with the roadway to the far west of the site. The result of this revision is that the site is being less intensively developed with greater distances between the proposed and the GII listed cottage known as 31 Norfolk Street.*" We welcome the recognition of this change as careful consideration has been given to reduce the number of dwellings within the Site from the previous scheme. However, the comments go on to state that the proposals: "*...results in the effect of a wall of development in the backdrop of the listed building, which changes its setting from one of open countryside to that of residential development.*"
- 3.2. We consider that this comment fails to acknowledge the layout of the proposed development with the spaces between each dwelling which helps to ensure the proposed dwellings do not appear as a solid wall of development but reflects the surrounding character in the area. This also fails to recognise the variety in the roofscape which helps to break up the massing of the dwellings, particularly when viewed from 31 Norfolk Street. Furthermore, as set out above, it is evident in the map regression and assessment of significance and setting that 31 Norfolk Street does not have an "*open countryside*" setting but already exists within a residential setting of the existing residential built form.
- 3.3. The conservation officer refers back to their comments on the approved scheme to the south (ref.: F/YR21/1055/O) with reference to the conjoining of the approved scheme and this development which is under consideration, in particular the reference of this residential development linking up to Morley Way. An attenuation pond has been located within the southern portion of this Site, separating this Site from the approved development to the south. This helps to keep the two areas of proposed residential development separate and prevent the merging of the two. Whilst this Site will add further residential development to this area of the village, the large plots and spacing of the proposed layout will respect



Fig. 1 Image within property boundary of 31 Norfolk Street, taken from Conservation Officers comments (fig. 4). Houses on March Road visible to the rear, circled in blue.



Fig. 2 Image within property boundary of 31 Norfolk Street, courtesy of conservation officer. CGI of roovescape of proposed dwellings.



Fig. 3 Image within property boundary of 31 Norfolk Street to the rear, taken from Conservation Officers comments (fig. 7). Morley Way visible in the views, circled in blue.



Fig. 4 Image within property boundary of 31 Norfolk Street to the rear, courtesy of conservation officer. CGI of roofscape of proposed dwellings.

the historic layout within the village.

- 3.4. The comments state that *"...there are vantage points from the front of 27 Norfolk Street and from the rear of the listed building. The proposed dwellings, despite their greater distance from the listed building would remain visible in the backdrop of these views and intrude on the appreciation of the listed building which at present is appreciated with no development in the backdrop, for which it has benefited from historically. A considerable amount of its significance is derived from a rural cottage with open land surrounding it. As a result of this development, that setting and significance will be impacted upon."* Firstly, it is important to establish that the reference to *"no development in the backdrop"* is incorrect and fails to acknowledge the residential development that is viewed behind 31 Norfolk Street. The images within the conservation officer's comments (Figs. 4 and 7 within the comments, reproduced as Figs. 1 and 3 within this note) both include a view taken from within the property boundary of 31 Norfolk Street and clearly show that residential development of March Road and Morley Way is visible in these views. In addition, it must be emphasised that from outside 31 Norfolk Street, standing on the public footpath, there are no views towards the Site. From this location, there are also no views of the Site seen in conjunction with the asset. Views only exist from within the property boundary.
- 3.5. The conservation officer's images use arrows to highlight where the proposed dwellings are thought to be visible. The client has prepared some CGI images of these specific view points to show where the proposed development would actually be seen. The CGIs produced by the applicant demonstrate that the roofscape of the proposed dwellings will be visible in conjunction with 31 Norfolk Street, however given the considerable separation distance, this is limited to one or two dwellings in each view and with a view of only the traditional gabled roof forms of the buildings which do not detract from our appreciation of the asset which is already seen and experienced alongside residential development. The proposed design of the dwellings is also not dissimilar from the character and form of ancillary outbuildings found in service yards and areas such as this. Certainly from the property, the view across the roofscape is not overtly domestic or dominant in character.
- 3.6. The conservation officer's comments note: *"The proposed dwellings are considered to be of comparable height to the existing listed building and the ground levels of the proposed development site is noticeably higher than the ground levels of the listed building. As such, the presence of the proposed development (taking into consideration their respective heights), are considered to unacceptably intrude on and clutter the surroundings and backdrop of the listed building and impact detrimentally on its setting and its appreciation in views towards it from various vantage points."* Whilst it is true that the proposed dwellings are of comparable heights to 31 Norfolk Street, the dwellings have been designed to sit lower than 31 Norfolk Street which has a ridge height of 10.96m with the proposed dwellings at 10.41m. The comments suggest that there is a substantial height difference as a result of the ground levels; the submitted section of the Site (Figure 5) highlights that this difference is minimal and not perceptible on the ground. Furthermore, the CGIs highlight the proposed dwellings will not clutter the backdrop of the listed building but simply be partially visible through the gaps in planting over the boundary fence seen within the context of surrounding residential built form.

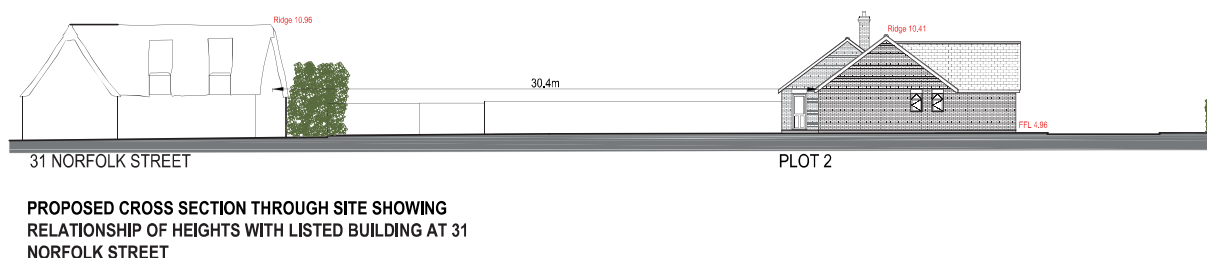


Fig. 5 Cross Section of the proposed dwelling and 31 Norfolk Street showing ridge heights and separation distance.



Fig. 6 Image from the viewpoint at Morley Way across to 31 Norfolk Street with the rear of the proposed dwellings marked by orange cones.

- 3.7. In addition to the view points from the listed building to the Site, the conservation officer's comments included a view point of *"current views from the public realm of Morley Way where the listed building is appreciated from the rear in context with the historic open landscape of the grazing land to the rear."* Currently this view is considerably screened by the 1.8m fence which separates the Site from Morley Way, limiting views towards the listed building from this area. Consideration has been given to this viewpoint through the design and layout of the scheme with the line of built form set back, preserving the view towards the asset (as shown in Figure 6).

Conclusions

- 3.8. The conservation officer's comments conclude:

"...the loss off one of the last remaining parcels of open land on the edge of the historic parts of the settlement will have a considerable impact on the setting of the GII listed 31 Norfolk Street. This is an in-principle objection to the loss of this grazing land. The setting of the LB is currently that of a building sat within its spacious grounds with a verdant and spacious field setting in the backdrop, as it has benefited from historically. The change to this setting would be considerable and alter the context that the Listed building is appreciated and understood. The development results in less than substantial harm (medium) to the identified heritage assets, for which national and local heritage policy and guidance points to a presumption against Councils supporting such development, unless there are strong public benefits which outweigh the harm identified."

As set out above, the description of the Site as *"grazing land"* (which evidence suggests it has never been) and part of the *"verdant and spacious field setting"* of 31 Norfolk Street aggrandises the importance of the Site to the setting of the listed building which today is more readily appreciated within the context of residential development which surrounds the asset and is symbolic of the evolving village throughout the 20th century. It is considered that the conservation officer's comments have failed to recognise the current setting of the listed building and the most important aspects of its setting which have historically and today focussed towards the east.

- 3.9. To conclude, the proposals have taken into consideration comments made on the previously withdrawn scheme to ensure the proposed built form better responds to the setting of the asset through a more

traditional layout of development, aligned along the western edge of the site and set away from the listed building. Key views will be preserved, and the new homes are appropriate in scale, massing and design details, reflecting the local character.

- 3.10. The proposals represent an opportunity to deliver residential development which respects the green, rural character of the village in a sensitive manner. In line with the objectives of para 203 of the NPPF, the development has responded to the local character and distinctiveness of the village.
- 3.11. The proposals are also considered to be in accordance with LP18 The Historic Environment of the Fenland Local Plan, in addition to the policy tests set out in the 1990 Act and Chapter 16 of the NPPF.

CONSERVATION REFERRAL COMMENTS

Application Ref: F/YR24/1000/F

Address: Land West Of 27 Norfolk Street Accessed from Morley Way, Wimblington

DC Case Officer: T Donnelly

Conservation Officer: S Falco

Date: 09/04/2025

The below is in response to the submitted rebuttal to the FDC Conservation objections, by the applicant's heritage consultant.

The comments have clearly been made to support the application and choose to take a different view of the assessed impacts surrounding the proposal.

The CGI images within the rebuttal clearly show that the current open backdrop that this GII listed cottage has benefitted from historically and how its setting will indeed be eroded by the presence of suburban development in close quarters. Essentially replacing open backdrop that has formed the setting of the listed building historically.

The view in figure 1 (below) of the rebuttal shows an open backdrop with a distant farmhouse and mature trees. Figure 2 CGI clearly shows the roofscape of modern development in a continuous line in the backdrop setting of this heritage asset. In my professional opinion, the rebuttal unintentionally highlights the harm, rather than negating. The CGI clearly shows a wall of development directly behind the key views of the listed building that interrupts its longstanding setting.



Fig. 1 Image within property boundary of 31 Norfolk Street, taken from Conservation Officers comments (fig. 4). Houses on March Road visible to the rear, circled in blue.



Fig. 2 Image within property boundary of 31 Norfolk Street, courtesy of conservation officer. CGI of roofscape of proposed dwellings.

Fig 4 and 5 below, although to a lesser extent owing to the existing building in the backdrop, still highlights the close quarters and impact on setting that would result from this development. It should also be noted that the existing backdrop building shown in fig 4 is circa 80m from the listed building, not circa 30m as will be the case with the proposed (fig 5).



Fig. 3 Image within property boundary of 31 Norfolk Street to the rear, taken from Conservation Officers comments (fig. 7). Morley Way visible in the views, circled in blue.



Fig. 4 Image within property boundary of 31 Norfolk Street to the rear, courtesy of conservation officer. CGI of roofscape of proposed dwellings.

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The statement raises that *'the conservation comments fail to acknowledge the layout of the proposed development, with the spaces between each dwelling'*. When referring to the wall of development that the rebuttal seeks to dismiss, I refer to the string of houses with attached pitched roof garages, with less than a meter between each, running in a continuous line directly behind the listed building. This acts to negatively alter the setting of the LB, by enclosing views that are currently open and providing a positive setting to the listed building.

The open agrarian land that the development is proposed is considered to be an important buffer in preserving the setting of the listed building.

The Morley Way development has indeed impacted the setting to a degree, but this current development proposal is located immediately to the rear of the listed building and therefore the additional impacts on the setting of the listed building are magnified.

Historic England guidance on setting states that *'where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policy, strong considerations need to be given to whether additional change will further detract from the significance of the asset'*. Negative change would include severing the last link between the asset and its historic setting, as would clearly be the case here.

It is considered that the author to the report has given insufficient weight to the contribution the historic area of open land makes to the setting of 31 Norfolk Street and indeed the edge of the historic settlement.

The rebuttal states that the OS mapping is a *'snapshot in time of a much smaller village that has changed substantially over the last century'*. Whilst there has been considerable growth and change, the immediate backdrop setting to the rear of the listed building has changed little.

Regarding the historic relationship between the host listed building and the agrarian land to the rear. Whilst there is no evidence of historic combined ownership, there is a clear and longstanding relationship and setting that this Listed Building has benefitted from historically, for which the rebuttal fails to consider.

Conclusions:

To conclude, there is a firm disagreement with the statements made in the rebuttal with regards to key views and setting being preserved. Furthermore, there is strong disagreement that the development accords with LP18 and heritage sections of the NPPF.

The proposals came forward with little heritage consideration and without a suitably detailed HIA. The HIA's have been created after the proposal has been put together and attempt to justify.

Owing to the impact on setting and the loss of one of the last remaining parcels of open land adjacent to the historic core of the village, the development will result in less than substantial harm (medium on the spectrum) and therefore is not deemed accord with Policy LP18 of the Fenland Local Plan 2014 and relevant heritage sections of the NPPF.

Finally, para 213 of the NPPF states that any harm to the significance of a designated heritage asset or its setting should require clear and convincing justification for which has not been provided.

Recommendation: Refuse