

Heritage Impact Assessment for [L] [SEP]

COTLEE, GROTON STREET GROTON, SUFFOLK CO10 5EE

For Mrs T Barkham & Mr N Barkham



Cover photo: Front elevation viewed from the southwest in Groton Street
National Grid Reference: 595863 – 241717

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Authorship of this Heritage Impact Assessment

This report is authored by Bob Kindred MBE BA IHBC - the former Head of Conservation, Urban Design & Planning Policy at Ipswich Borough Council with well over 40 years' continuous professional experience in the public, private and voluntary heritage sectors. He was awarded the MBE for services to heritage in 1999.

He is Vice-Chair of the Education Training & Standards Committee of Institute of Historic Building Conservation and a member of its Policy Committee; a Trustee of Historic Buildings & Places (formerly the Ancient Monuments Society) and the Suffolk Preservation Society; a Casework Panel member of the Society for the Protection of Ancient Buildings; the Heritage Assessor member of the RIBA Suffolk Design Review Panel; an Honorary Member of the Suffolk Association of Architects since 1992; and a member of the St Edmundsbury & Ipswich Diocesan Advisory Committee.

He was the Standing Special Heritage Advisor to the House of Commons Culture Media & Sport Committee [2005 to 2012] advising on five major heritage inquiries; a member of the UK Commission for UNESCO [1999 to 2010]; and on the Main Committee of the Victorian Society [1987 to 1997].

He was part of the Regulatory Working Group of the sector wide Power of Place Inquiry 1997-9 and was seconded to the DCMS to advise on Heritage Protection Reform 2004-7 and the draft Heritage Protection Bill 2009.

He was at the forefront of buildings-at-risk initiatives having successfully piloted local authority computerized survey and analysis with English Heritage in 1984, well before the commencement of their own at-risk register in 1999.

He initiated the concept of Heritage Partnership Agreements [HPAs] in 1992 (for the Grade 1 Willis Building in Ipswich) and these protocols were subsequently formally incorporated into heritage legislation via the Enterprise and Regulatory Reform Act 2013.

He chaired the Task Group and Vice-Chaired the Steering Group for the Heritage Maintenance Project '*Maintaining Value*' 2002-4 funded by the Dept of Trade & Industry, English Heritage and the HLF with support from CITB-Construction Skills and input by the National Trust, SPAB and other sector partners.

His definitive publication on Listed Buildings Repairs Notices was the only non-governmental reference source included in PPG15 and he advised ODPM on their Best Practice Guidance on Listed Building Prosecutions having established in 1996 (and continues to maintain) the national on-line database of Listed Building Prosecutions.

He provided external input to the 2019 Saunders Report on the Review of Listing to Historic England (HE Research Report 27/2021).

His portfolio of project involvements includes the assessment, evaluation and recording of historic buildings and heritage sites and has prepared numerous heritage impact assessments to accompany applications for planning permission and listed building consent relating to both designated and non-designated heritage assets of all forms and grades.

He was editor of the IHBC's professional journal *Context* from 1989-1999; has been one of the three Consultant Editors of the international *Journal of Architectural Conservation* since 2005; and is an editor of *Heritage Now*, and is the author of a number of heritage publications including contributions to the professional literature on historic windows and the care and management of 20th century historic buildings and is the joint author of the *Dictionary of Architects of Suffolk Buildings 1800-1914*.

1. INTRODUCTION

1.1 Bob Kindred Heritage Consultants were commissioned by Mr Neil Barkham & Mrs Trusje Barkham via Kirkham Sheidow Architects to undertake a Heritage Impact Assessment [HIA] in accordance with the National Planning Policy Framework [NPPF 07-2021] in support of planning proposals for minor ground floor alterations and an extension to Cotelee, Groton Street, Groton CO10 5EE.



Fig. 1 Location Plan, map not reproduced to scale

1.2 Cotelee forms part of a larger Grade 2 listed building but is not situated within a designated conservation area. The works are confined to the ground floor rear (east) and link to a modern outbuilding in use ancillary to the dwelling and built in c.1997.

1.3 Although Cotelee is in the vicinity of several other listed buildings it is considered that there would be no material heritage implications relating to their setting. Further reference is made to these in Sections 3 and 7.

1.4 An external and internal inspection of the dwelling and the ancillary curtilage outbuilding was undertaken on 28th April 2023 in order to assess the heritage significance (or otherwise) and any impact (or otherwise) of the proposals on the two buildings and their immediate surroundings. The photographs in this assessment were taken on that date unless otherwise specified.

1.5 The nature of the proposed works is set out in the accompanying Design & Access Statement and application drawings by Kirkham Sheidow Architects and this HIA should be read in conjunction with that documentation.

1.6 The proposals were the subject of pre-application advice from Babergh District Council (Ref: DC/22/05398) dated 23rd November 2022 to which further reference is made below in Section 7 in particular.

1.7 This report may be deposited with Suffolk Historic Environment Record and a copy sent to the National Monuments Record maintained by Historic England if required.

2. NATIONAL POLICY

2.1 The law relating to listed buildings is enshrined in the Planning (Listed Buildings and Conservation Areas) Act 1990. This places a duty on local planning authorities to have special regard to the desirability of preserving listed buildings and any features of importance, and regarding their settings (Sections 16 and 66).

2.2 The Heritage Impact Assessment to accompany the proposals for internal and minor external alterations and extension is intended to comply with the requirements of NPPF [07-2021] paragraph 194.

2.3 Applicants must describe the impact of proposals on the significance of any heritage asset to a level of detail proportionate to the assets' importance.

2.4 The assessment should be no more than is sufficient to understand the potential of that impact on the significance; and further, to assist under the terms of paragraph 195 with an assessment of the relationship between the conservation of the special architectural and historic interest and any works necessary to ensure continued use, maintenance and viability.

2.5 Paragraphs 199 and 200 of the NPPF apportion great weight to a designated asset's conservation. The more important the asset, the greater the weight should be¹. The NPPF asserts that significance can be harmed or lost through alteration and any harm requires clear and convincing justification.

2.6 Where development proposals will lead to less than significant harm as is considered to apply in this instance, paragraph 202 the NPPF requires the special interest to be weighed against the public benefits, including securing optimum viable use as made explicit in the on-line National Planning Policy Guide [NPPG]. This will be the responsibility of the District Council as local planning authority to determine. This is dealt with in paragraphs 7.20 et seq.

2.7 The vast majority of designated heritage assets are in private hands. Not all heritage assets will have historic fabric of equal heritage merit; however, sustaining heritage assets in the long term often requires an incentive for their active conservation that will involve alteration or extension sometimes by modernisation in the interests of civilized occupation². A heritage asset in a viable, practical use is likely to lead to investment in the maintenance necessary for its long-term conservation.

2.8 The best use for a heritage asset is generally considered to be its original use and is often the only viable use without unacceptable alteration. The NPPF and NPPG do not make it explicit that the optimum viable use may not necessarily be the most economically viable one (nor need necessarily be the original use).

2.9 Paragraph 206 of the NPPF [07-2021] encourages local planning authorities to look for opportunities for new work within (...) the setting of heritage assets, to enhance or better reveal their significance and quality of design is addressed in Section 12 of the NPPF and the National Design Guide as set out below.

2.10 The NPPF defined criteria in paragraph 197 as the basis on which the Council should determine applications. In this instance the proposals for alterations and extension therefore aim to:

- [a] sustain and enhance the listed building and put it to a more efficient and practical use consistent with its conservation; and
- [b] positively contribute to sustaining this part of Groton and its economic and social vitality.

¹ Relative heritage significance is set out in Section 5 below

² Or reasonable modern expectations of e.g., comfortable family life

Considering the National Framework as a whole

2.11 In weighing up the considerations in the NPPF [07-2021], the Framework makes clear in paragraph 3 that it should be read as a whole (including its footnotes and annexes) including the presumption of sustainable development in Section 2 paragraphs 7 and 8 and core land use principles.

2.12 The Framework sets out three overarching objectives as a means of achieving sustainable development through the planning system. These matters are interdependent and need to be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the different objectives.

2.13 Although the economic, social and environmental objectives (including the protecting and enhancement of the built and historic environment, including making effective use of land) should be delivered through the preparation and implementation of plans and the policies in the NPPF [07-2021] they are not criteria against which every decision can or should be judged.

Design Quality

2.14 With regard to the proposed link building, the NPPF (07-2021) also attaches great importance to matters of design. Paragraph 126 states that:

The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

2.15 Paragraph 130 states that:

Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

National Design Guide

2.16 MHCLG³ published the *National Design Guide* (NDG) on 1st October 2019⁴ which sets out the characteristics of well-designed places and demonstrates what good design means in practice. It forms part of the Government's collection of planning practice guidance and should be read alongside the separate PPG on Design Process and Tools.

³ Now the Department for Levelling Up, Housing and Communities [DLUHC]

⁴ Last updated 30th January 2021

2.17 Good design in Part 2 of the NDG 1 is set out in 10 characteristics of which six are considered to be particularly germane in this instance:

- Context – the guide says that good design ‘enhances the surroundings’
- Identity – good design is ‘attractive and distinctive’
- Built form – good design delivers ‘a coherent pattern of development’
- Movement – well-designed places should be ‘accessible and easy to move around’
- Resources – well-designed places and buildings are ‘efficient and resilient’ and ‘conserve natural resources including land, water, energy and materials’
- Lifespan – developments should be ‘made to last’.

2.18 In these respects it is therefore considered that the scheme would meet the requirements of the Planning (Listed Building and Conservation Areas) Act 1990 and Sections 12 and 16 of the National Planning Policy Framework [07-2021].

3. HERITAGE ASSETS

Statutory listed buildings - distribution

3.1 The general distribution of listed buildings in relation to Groton Street are widely scattered and is shown in Figures 2 and 3.



Fig.2 General wide somewhat thin distribution of listed buildings (as blue triangles) in the vicinity of Groton Street with Figure 3 as the highlight box and Cotlee ringed in red. [Source National Heritage List for England]



Fig.3 Enlargement of Fig.2 with Cotlee shown in dark pink with the other elements of the one listing entry in light pink and the other listed buildings in the vicinity in mid-blue.

Listing generally

3.2 The statutory Lists are widely recognised as an outstanding national achievement. They are the foundation stone for the system of protection of England's most important historic buildings, one that is robust and widely admired.

3.3 Compiled originally as an emergency procedure to evaluate the significance of buildings damaged or threatened by enemy action during the Second World War, listing progressed on a more thorough footing during peacetime following the 1947 Town & Country Planning Act until, by the mid 1960s, there were over 85,000 listed buildings⁵.

⁵ The number of entries on the statutory list has grown from 12,496 in 1951 to approximately 500,000⁵ heritage assets formally protected today. - Delafons J. Politics & Preservation – A policy history of the built heritage 1882-1996. E&FN Spon 1997 p.79

3.4 The listing survey work was undertaken in two campaigns using 15 full-time Ministry staff and was characterised by speed, rather than depth; the Chief Investigator of the time estimated that 90% of the right buildings could be identified and protected but background research was minimal, inspection was rapid and descriptions of the buildings were brief⁶.

3.5 The re-survey was accelerated after 1979 by the Department of the Environment under Secretary of State Michael Heseltine and was conducted on a parish-by-parish basis and was largely completed by the early 80s by which time responsibility for recommendations to the Secretary of State was passed to English Heritage [sic] in April 1984.

Listing – Cotlee

3.6 Cotlee together with Mittecott (to the centre) and Byeways (at the northern end) form one list entry at Grade 2 added to the statutory List on 10th July 1980 [List Entry Number: 1037286, Legacy System No: 276500, National Grid Reference: TL 95858 41732]. The statutory description as follows is now 43 years old and has not been amended:

GROTON STREET 1. 5377 (east side) Cotlee, Mittecott and Byeways TL 9541 59/352 II GV 2.

A C15-C16 timber framed and plastered building with cross wings at the north and south ends. Originally a hall house but renovated and altered into 3 tenements. Roof tiled, with a C17 ridge chimney stack with 3 diagonal shafts 2 storeys. The upper storey of the cross wings is jettied on exposed joists and curved brackets. One: two: one window range of modern metal casements. Two gabled dormers to the centre block. The north wing has a rebuilt old chimney stack, originally with octagonal shafts.



Fig.4 Front (west) elevation from Groton Street

3.7 The description of the building is typical of those added to the statutory list during the concluding phases of the parish-based national surveys carried out by officials of the Department of the Environment prior to 1984⁷.

⁶ Heritage Protection Reform – Statutory Lists: Review of Quality and Coverage (July 2010) Dr Martin Cherry, English Heritage (unpublished) p.14

⁷ English Heritage assumed responsibility for listing recommendations to the Secretary of State from the Department of the Environment in April 1984 until April 2015 when these passed to Designation Branch of Historic England.

3.8 It should be noted that with regard to the fenestration as described in the statutory list that the present windows to Cotlee (and the front elevations of Mittecott and Byeways) are now modern timber casements⁸ not metal as described above. It is evidently apparent that Cotlee (and probably the other two tenements) have been re-rendered⁹. Furthermore, Cotlee appears to have undergone a major roof overhaul in the recent past. (Fig.11)

3.9 Prior to heritage protection reforms at the end of the 20th century designation descriptions served more for the purposes of identification than as an objective evaluation of the degrees of significance and/or the component features contributing to a building's special architectural and historic interest.

3.10 In all these respects the description of the three properties combined does not represent current best practice regarding designation and the assessment of relative significance.

3.11 Such descriptions are considered unhelpful to the local planning authority; the owner; any professional advisor, the statutory amenity bodies or to the general public in evaluating the relative merits of the surviving historic fabric.

3.12 The relative significance of designated heritage assets has been long established by national and international conventions and this is set out in more detail in Section 5. Under this Cotlee would be assessed as being of Medium/Moderate heritage significance and in applying legislation, policy and guidance this should inform the basis for the proportionate approach to the proposed works.

3.13 Such an assessment notwithstanding, it should be noted that past alterations (particularly any of an unsympathetic character and those not requiring consent before 10th July 1980¹⁰) might also affect such an assessment and supplementary to the relative heritage significance ascribed to formal designations¹¹ there will be relative degrees of heritage significance within buildings depending on the extent of surviving historic fabric, use and layout etc.

Listings in the vicinity

3.14 There are three listed buildings in the near vicinity of Cotlee as shown in Figure 3. The Church of St Bartholomew, situated about 93M to the east-southeast¹² was listed Grade 1 in January 1958. To the south-southwest of Cotlee at a distance of 29M is the Old School House (now a dwelling) and built in c.1854; and to the north of Byways is the Grade 2 Crown House also listed in January 1958.

3.15 It is contended that by virtue of distance, orientation, curtilage and boundary landscaping; and/or the location of other interposed buildings or structures; there would be no impact on the setting or heritage significance of these historic buildings arising from the proposals.

⁸ Those to Cotlee are all now double-glazed units.

⁹ Window replacement was undertaken with the benefit of listed building consent at Cotlee in 1988 (BDC Ref: B/LB/88/80173) and at Mittecott in 2004 (BDC Ref: B/04/00795) when the latter work also included renewal of the front elevation render. If renewal of the render at Cotlee had predated July 1980, listed building consent would not have been required. Babergh Council's planning files do not record the work if this was the case.

¹⁰ The date of listing

¹¹ Varying listing grades

¹² Measured from the southeast corner of Cotlee to the northwest corner of the north aisle of the church

4. PRINCIPLES OF SIGNIFICANCE

Principles

4.1 A consistent but evolving thread of long-standing central government heritage policy advice¹³ regarding the principles of repair and alteration to historic buildings, continues to apply today namely:

- Each historic building has its own characteristics, which are usually related to an original or subsequent function and these should as far as possible be respected when proposals are put forward.
- Alterations should be based on a proper understanding of the significance and repairs should usually be low-key, re-instating or strengthening only where appropriate and new work fitted to the old to ensure the survival of as much historic fabric as is practical. Old work should not be sacrificed merely to accommodate the new.

4.2 These aspects need to be balanced with the fact that buildings need to evolve, supported by the planning system, which considers conservation to be a process of managed change,¹⁴ rather than prohibiting it, and the fact that 'keeping a significant place in use is likely to require continual adaptation and change'.¹⁵

Historic England 'Conservation Principles: Policies and Guidance (2008)'¹⁶.

4.3 Historic England (formerly English Heritage) sets out in this document a logical approach to making decisions and offering guidance about all aspects of England's historic environment, including changes affecting significant places. The guide sets out six high-level principles:

- *"The historic environment is a shared resource;*
- *Everyone should be able to participate in sustaining the historic environment;*
- *Understanding the significance of places is vital;*
- *Significant places should be managed to sustain their values*
- *Decisions about change must be reasonable, transparent and consistent*
- *Documenting and learning from decisions is essential"*

4.4 'Significance' lies at the core of these principles, the sum of all the heritage values attached to a place, be it a building, an archaeological site or a larger historic area such as a whole village or landscape. The document sets out how heritage values can be grouped into four categories:

- **Evidential value:** *the potential of a place to yield evidence about past human activity;*
- **Historic value:** *the ways in which past people, events and aspects of life can be connected through a place to the present - it tends to be illustrative or associative;*
- **Aesthetic value:** *the ways in which people draw sensory and intellectual stimulation from a place;*
- **Communal value:** *the meanings a place for the people who relate to it', or for whom it' figures in their collective experience or memory."*

These are addressed again below.

4.5 It states that:

"New work or alteration to a significant place should normally be acceptable if:

- a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;*
- b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;*

¹³ Commencing in 1977

¹⁴ NHCLG Planning Practice Guide

¹⁵ English Heritage (sic) Conservation Principles, 43

¹⁶ Revision (and simplification) is in preparation by Historic England (a draft is anticipated for public consultation during mid-to-late 2023)

- c. *the proposals aspire to a quality of design and execution which may be valued now and in the future;*
- d. *the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future"* (page 58).

4.6 Although 'Conservation Principles' (2008) has made a long-lasting and impactful change to the formation of current heritage thinking, it has never been adopted as public policy and has no formal status in the planning system¹⁷.

4.7 As a guidance document it lacks official weight in policy or decision making at national level and is has not been referenced at any stage in the relevant Section of the various iterations of the NPPF¹⁸.

Historic England Advice Note 2 Making Changes to Heritage Assets: (2016)

4.8 This document provides information on repair, restoration, addition and alteration works to heritage assets. It advises that: "*Restoration works are those that are intended to reveal or recover something of significance that has been eroded, obscured or previously removed. In some cases, restoration can thus be said to enhance significance*" (paragraph 25, page 6).

Heritage Assets

4.9 A heritage asset is defined within the NPPF as "*a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage asset and assets identified by the local planning authority (including local listing)*" (NPPF Annex 2: Glossary).

4.10 'Significance' for built assets can be assessed using the criteria set out in the national statutory list guidance. The criteria tend to be those that lead to an asset being designated for its national importance. 'Value' on the other hand can related to public perceptions of importance and can be assessed using the guidance in Historic England's Conservation Principles (2008).

4.11 In assessing the significance it is important to appreciate that heritage assets may be affected either by direct physical intervention or to their setting, or both and such interventions may be assessed as harmful, beneficial or neutral in effect.

4.12 Beyond the criteria applied for national designation, the concept of value can extend more broadly to include an understanding of the heritage values a building or place may hold for its owners, the local community and other interest groups. These aspects of value do not fall into the criteria typically applied for designation and require a broader assessment of how a place holds significance.

4.13 In seeking to prompt broader assessments of value, Historic England's Conservation Principles categorizes the potential areas of significance (including and beyond designated heritage assets] under the following headings and as summarised below.

¹⁷ Chitty. G & Smith C. Historic Environment – Policy & Practice Vol.10 Nos.3-4 2019 p.284

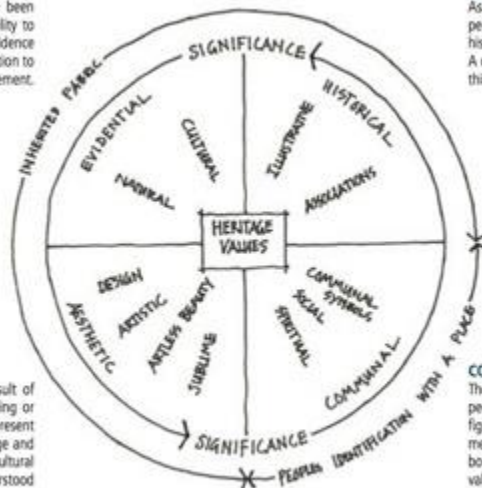
¹⁸ i.e., 2012 and the, 2108, 2019 and 2021 revisions

EVIDENTIAL VALUE
The physical remains that have been inherited from the past. The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.

HISTORICAL VALUE
Association with a notable family, person, event, or movement can give historical value to a building or place. A degree of intactness must survive for this to be fully appreciated.

AESTHETIC VALUE
Aesthetic values can be the result of the conscious design of a building or place (see fig 14). They can represent such elements as its patina of age and often be specific to a time and cultural context. These need to be understood to place the building or place in a time when the value of their design may have been different.

COMMUNAL VALUE
The meaning(s) of a place for the people who relate to it, or for whom it figures in their collective experience or memory. Communal values are closely bound up with historical and aesthetic values. This links closely to those values applied to conservation areas and the recording of the familiar and cherished local scene.



Heritage value of the present building

4.14 Cotlee may therefore be considered to demonstrate good but partial:

evidential value about past human activity from the physical origins of the original building in 15th – 16th century - but much altered later as part of sub-division in relation to its conjectured original summarised in Section 5.

aesthetic value is most readily associated with the conscious design of a place and is not usually associated with the vernacular building tradition where mindful artistic endeavour is absent but the building frontage to Groton Street generally exhibits its likely late mediaeval form, however, national planning policy as set out under the *Conservation Principles* above (and the NPPF) also encourages and emphasises good modern design as adding to the evolution and narrative story of such buildings.

historic value can be seen in those features that survive from an early date, such as internally exposed timber-framing; connecting the past character and interest of the building to the present. This tends to be illustrative or associative and is demonstrated by visible evidence resulting from the response of successive occupiers to changing circumstances. The history of the building can be discerned but in a living tradition that encourages occupation as a form of custodianship from one generation to another, each successive occupation adjusting the comprehension of heritage values that may be by adaptation, obliteration or concealment.

communal value is normally defined as commemorative and symbolic as being the basis on which a place derives its identity and distinctiveness and are sometimes associated with collective memory and association. This is usually but not always associated with places rather than buildings but the communal value in this instance being one of three tenement dwellings in a diffuse village settlement pattern.

4.15 Based on these values, the Table below sets out the levels of impact that may occur and whether these can be considered adverse or beneficial.

TABLE - Magnitude of Typical Criteria Descriptors and Impact	
Very High	<p>Adverse: Impacts will destroy cultural heritage assets resulting in their total loss or almost complete destruction.</p> <p>Beneficial: The proposals would remove or successfully mitigate existing and significant damaging and discordant impacts on assets; allow for the substantial restoration or enhancement of characteristic features.</p>
High	<p>Adverse: Impacts will damage cultural heritage assets; result in the loss of the asset's quality and integrity; cause severe damage to key</p>

	<p>characteristic features or elements; almost complete loss of setting and/or context of the asset. The assets integrity or setting is almost wholly destroyed or is severely compromised, such that the resource can no longer be appreciated or understood.</p> <p>Beneficial: The proposals would remove or successfully mitigate existing damaging and discordant impacts on assets; allow for the restoration or enhancement of characteristic features; allow the substantial re-establishment of the integrity, understanding and setting for an area or group of features; halt rapid degradation and/or erosion of the heritage resource, safeguarding substantial elements of the heritage resource.</p>
Medium	<p>Adverse: Moderate impact on the asset, but only partially affecting the integrity; partial loss of, or damage to, key characteristics, features or elements; substantially intrusive into the setting and/or would adversely impact upon the context of the asset; loss of the asset for community' appreciation. The assets integrity or setting is damaged but not destroyed so understanding and appreciation is' compromised.</p> <p>Beneficial: Benefit to, or partial restoration of, key characteristics, features or elements; improvement of asset quality; degradation of the asset would be halted; the setting and/or context of the asset would be enhanced and understanding and appreciation is substantially improved; the asset would be brought into community use.</p>
Low	<p>Adverse: Some measurable change in assets quality or vulnerability; minor loss of or alteration to, one (or maybe more) key characteristics, features or elements; change to the setting would not be overly intrusive or overly diminish the context; community use or understanding would be reduced. The assets integrity or setting is damaged but understanding and appreciation would only be diminished not compromised.</p> <p>Beneficial: Minor benefit to, or partial restoration of one (maybe more) key characteristics; features or elements; some beneficial impact on asset or a stabilisation of negative impacts; slight improvements to the context or setting of the site; community use or understanding and appreciation would be enhanced.</p>
Negligible	Barely discernible change in baseline conditions.
Nil	No discernible change in baseline conditions.

5. RELATIVE HERITAGE SIGNIFICANCE

General considerations of heritage significance

5.1 To place the heritage significance of building in a national context it is necessary to consider this based on the principles set out above. Differing levels of significance/heritage value have been enshrined in the national designation system since its inception, and from c.1947 and initially categorised statutorily protected buildings and structures as falling into Grades 1, 2 and 3.

5.2 This stratification was later amended from c.1970 to Grades 1, 2* and 2 with some former Grade 3 buildings becoming colloquially known as 'DoE Local List' no longer enjoying formal statutory protection and a forerunning category encompassing what are now defined as undesignated heritage assets.

5.3 Further categorisation was widely adopted after January 2011 following the publication of ICOMOS¹⁹ Guidance on Heritage Impact Assessments for Cultural World Heritage Properties. Appendix 3A: *Example Guide for Assessing Value of Heritage Assets* was adopted by English Heritage in its May 2011 guidance: "Seeing History in the View – A method for assessing heritage significance within views"²⁰ and has become the generally accepted approach. This is set out in the Table below defining and ascribing level of significance/value to each designation category.

Significance	Examples
Very High	World Heritage Sites, Listed Buildings and Scheduled Monuments of exceptional quality, or assets of acknowledged international importance or can contribute to international research objectives. Grade 1, Grade 2* and Grade 2 Registered Parks and Gardens and historic landscapes and townscapes of international sensitivity.
High	Grade 1, Grade 2* and Grade 2 Listed Buildings and built heritage of exceptional quality. Grade 1, Grade 2* and Grade 2 Registered Parks and Gardens and historic landscapes and townscapes which are extremely well preserved with exceptional coherence, integrity, time-depth, or other critical factor(s).
Good	Scheduled Monuments, or assets of national quality and importance, or that can contribute to national research objectives. Grade 2* and Grade 2 Listed Buildings, Conservation Areas with very strong character and integrity, other built heritage can be shown to have exceptional qualities in their fabric or historical association. Grade 2* and 2 Registered Parks and Gardens, Registered Battlefields and historic landscapes and townscapes of outstanding interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).
Medium/ Moderate	Grade 2 Listed Buildings, Conservation Areas, locally listed buildings and undesignated assets that can be shown to have good qualities in their fabric or historical association. Grade 2 Registered Parks and Gardens, Registered Battlefields, undesignated special historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
Low	Assets compromised by poor preservation and/or poor survival of contextual associations but with potential to contribute to local research objectives. Historic buildings or structures of modest quality in their fabric or historical association. Locally listed buildings and undesignated assets of moderate/low quality. Historic Landscapes and townscapes with limited sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.
Negligible/ none	Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note.

¹⁹ ICOMOS – International Council for Monuments and Sites

²⁰ Table 1 p.19

	Landscapes and townscapes with no surviving legibility ¹ and/or contextual associations, or with no historic interest.
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5.4 According to the criteria above for national (and international) designations, Cotlee, Grotton, as a Grade 2 heritage asset would be assessed as being of **Medium/Moderate** heritage significance but this is an overall evaluation and ***it should be emphasised*** that past alterations (particularly those of an unsympathetic character) may also affect such assessment and that in addition to the degrees of heritage significance for such formal designations, there will also be relative degrees of heritage significance **within buildings** depending on the surviving historic fabric, use and layout as set out above.

6. BRIEF HISTORICAL OUTLINE

Cartography

6.1 Local historic maps prepared before the late 19th century tend to be imprecise, only indicative of buildings within settlements and are generally not informative, being neither of adequate in scale nor sufficiently accurately drawn to be instructive. Late 19th century and early 20th century Twenty-Five Inch Series Ordnance Survey maps for England however provide much greater clarity and considerable accuracy regarding past layouts at a large scale.

6.2 The Twenty-Five Inch Series Ordnance Survey map extracts for Groton Street for 1902 [published 1903] (Fig.5) and 1924 [published 1926] (Fig.6) suggest not three tenements but six with what is now Cotlee shown as three dwellings. Furthermore, the westward element to the southern cross-wing is shown to breaking well forward of the present overall building line²¹ (by comparison with the representation in Figure 3), notwithstanding the presence of a jetty. This configuration is unexplained²² but is not germane to the present proposals.

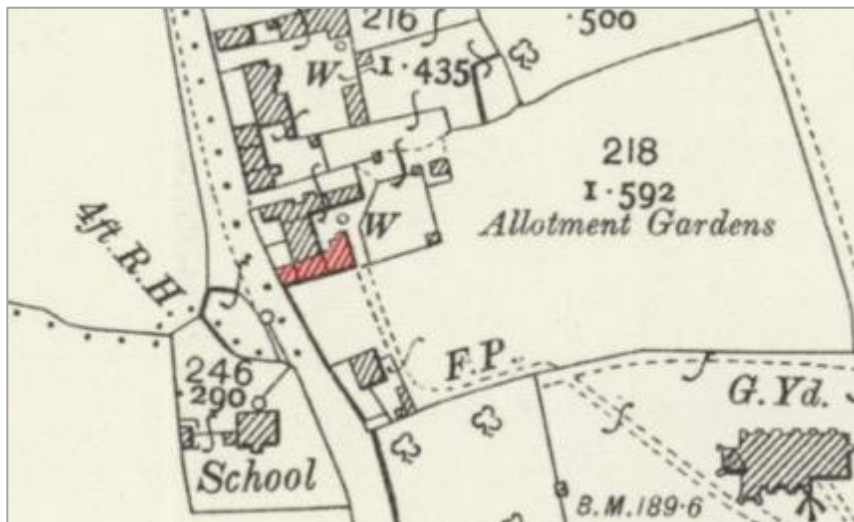


Fig.5 Twenty-Five Inch Series Ordnance Survey map extract 1902 [published 1903]. Cotlee in red



Fig.6 Twenty-Five Inch Series Ordnance Survey map extract 1924 (published 1926) Cotlee in red

²¹ Twenty-Five Inch Series Ordnance Survey maps are highly accurate and this similar forward projection at Byways is also now not evident. Also, there is no indication of the present entrance porches such as is indicated at the (former) School opposite

²² Although may be work post-dating 1945 (qv para 6.6)

Brief historical context

6.3 Cotlee together with Mittecott (to the centre) and Byways (at the north end) is understood from historical research to have formed what was once a single house in an 'H' planform characteristic of the mid 15th to mid 16th centuries²³.

6.4 This suggested that its original or early adapted use had been that of an inn based on the identification of a number of uncommon features some of which are confined to the centre and north side of the building (noted to include smoke blackened timbers above the original central open hall) but are not otherwise discussed further in relation to the present proposals that relate solely to the rear (east) ground floor of Cotlee.

6.5 It is understood that a photograph from around 1900 (untraced) shows additional lower wings added against the front of the two cross-wings as noted on the OS maps above) and at that time the building had been divided into the six tenements shown in Figures 6 and 7.

6.6 It is further understood that by 1945 the property overall had become semi-derelict and structurally unstable particularly with regard to the south cross-wing to Cotlee leaning outward (as remains partly the case (Fig.11) but was then acquired by local builders Messrs. Kingsbury who then renovated it, converting it by amalgamation into the present three units.

6.7 The post-war work also appears to have include the insertion of the central cross-stair and associated walls in Cotlee; insertion of archetypical mid-20th century suburban-style internal panelled doors; the possible addition of the timber-framed gabled porches to each property²⁴ (Figs.7 & 8) and the adoption of the metal casements (of unknown form) referred to in the listing. These windows were replaced in turn with a (broadly) traditional pattern of timber casements for two of the properties under listed building consents granted in c.1988 and c.2004²⁵.



Fig. 7 Porch to Cotlee



Fig.8 Use of hard cement render & metal lath

6.8 No records exist of past works of alteration from the 19th century or after the Second World War and the Council does not retain any details of the works undertaken under the various consents granted in 1988, 1993 or 1997.

²³ Historical analysis undertaken by John Walker (unpublished), December 2008.

²⁴ The form of 20th century construction can be seen in the expanded metal lathing and hard cementitious render used in the porch gable at Cotlee.

²⁵ Cotlee and Mittecott respectively but unfortunately to a different glazing pattern at Byways thus ignoring or deliberately departing from the original visual unity of the whole.

6.9 In the absence of an archive, it is considered that a proportionate view should be taken (in line with NPPF (07-2021) paragraph 194 about the residual heritage value of those alterations and extensions made throughout the history of the building but particularly in the post-World War 2 epoch.

6.10 In the modern era, works now considered of little or no comparative heritage significance or likely to have been aesthetically unsympathetic (such as metal casements) were undertaken as permitted development under planning legislation and/or pre-dated heritage legislative requirements²⁶

6.11 While it is noted in the Section 5 (paragraph 5.4) that Cotlee as a Grade 2 Listed building has overall Medium/Moderate heritage significance; past alterations (particularly internally and at the ground floor east end) have eroded that heritage significance to some degree resulting in the survival in some areas of only vestigial components of historic fabric as set out in Section 7.

6.12 In noting above, the former division of a single original building into numerous tenements (and the three modern porches and fenestration variations notwithstanding) the three properties were grouped together as one listing entry and continue to indicate that original former single entity²⁷. That being the case the Council's contention that Cotlee "*remains (externally) visibly and physically a small cottage*" is considered to be erroneous and while it would not now generally be described as a tenement²⁸, it should reasonably be called an apartment (as part of a larger original building).

²⁶ i.e., before 10th July 1980

²⁷ Despite being a vernacular building of the 15th-16th century, when viewed from the front in Groton Street the overall elevation displays a coherent unifying degree of symmetry.

²⁸ A noun, and variously defined in Dictionaries as: [a] a building for human habitation, especially one that is rented to tenants; [b] a rundown, low-rental apartment building whose facilities and maintenance barely meet minimum standards; and/or [c] an apartment or room leased to a tenant.

7. PROPOSALS

Introductory remarks

7.1 The assessment below has been produced solely to inform consideration of the relative merits of the minor works to those limited parts of the listed dwelling affected by the proposals. This is considered a proportionate approach as advocated by the NPPF [02-2019] paragraph 194 and Historic England Heritage Advice Note 12.

7.2 Three particular precepts should be noted in this Assessment:

- o the national and international conventions on relative heritage significance set out in the Appendix; and,
- o the principle of conservation as managed change set out in paragraphs 4.1 and 4.2 above.

In summary

7.3 The proposals comprise a new single-storey entrance and dining rear extension with minor internal alterations to the eastern end of the ground floor of the existing dwelling linking to an existing annexe completed in c.1997. The intention of the minor internal alterations is to provide an accessible guest suite and utility areas appropriate to the requirements of contemporary living²⁹.

7.4 The scheme proposals are explained in the Design & Access Statement and shown in the relevant drawings by Kirkham Sheidow Architects and are not set out in detail here but in essence the works are as follows.

7.5 Notwithstanding the qualifications in Sections 4 and 5 regarding relative heritage significance and past alterations over a prolonged period (not all of them of a sympathetic nature), the proposed works of alteration are minor and to modern fabric of low heritage significance while ensuring that surviving historic fabric of an early date will be retained while making the dwelling suitable for current day occupation, living standards and sustainability.

Listed building

7.6 The works to the listed building are confined to the eastern extremity of the ground floor of the property. The layout takes the form of a modern six-light, part-glazed rear entrance door, leading to a small lobby with small rooms to each side. To the left a larder (south) and to the right (north) a WC both with modern, painted wooden ledge and brace doors. (Figg.10) The lobby leads via a panelled door of ubiquitous interwar design to the kitchen. The east facing end elevation windows to both of larder and the WC are modern top-hung casements and together with the external and internal door joinery are of no heritage significance. (Fig.9)

7.7 Apart from the inter-war internal kitchen door, these works may be part of the alterations consented in 1988, but with the exception of the decision notice itself, the council now has no documentary record of precisely what those works comprised.

7.8 Reference has been made above to what is understood to have been the poor structural condition of the building at the end of the Second World War, and as evidence suggests that the east elevation wall had moved outward from the base³⁰; as part of the remedial works the ground floor east elevation wall was underbuilt in perpendicular brickwork and the junction with the timber-frame capped by a lead flashing. (Fig.9)

²⁹ The ground floor (and indeed parts of the first floor) have several changes of level, for example from the existing kitchen for the small hallway/stair lobby and thence to the sitting room beyond; and from the small landing stepping up to the westerly bedrooms and down to the central bedroom corridor and then upward again to the rear family bathroom – none of these changes providing appropriate level access.

³⁰ As evident in the alignment of the first-floor gable wall in Figure 11



Fig.9 East gable end elevation to Coflee showing underbuilt ground floor in brick (with cover lead flashing and modern casement windows and door) and a panel of investigation of the rendered ground floor exposing red Imperial brickwork in lime mortar

7.9 A small exploratory panel in the external render (shown in Figure 9) reveals this ground floor construction to have been in traditional, red Imperial sized brickwork in lime mortar and this is considered to be of low or no material heritage significance.

7.10 With regard to the inner transverse walls, enclosing the lobby, larder and WC (and separated from the kitchen by the mid-20th-century door), a small exploratory intervention has been undertaken to determine the nature of the wall construction to the entrance lobby outer facing wall (but not to risk potential damage to any concealed historic fabric).

7.11 This has indicated that this is also in modern brickwork and faced in a modern, smooth and very regular gypsum plaster with no patina of age. This modern work is also considered to be of negligible to no heritage significance.



Fig.10 Kitchen facing east with proposed enlargement of the plastered brick wall indicated in red. Note the modern kitchen and WC doors. Ceiling joists unaffected by the proposals.

7.12 The intention is to form an enlarged opening in both the inner lateral brick wall and the exterior wall to better connect the kitchen with a proposed new link building - which itself will be connected to the Annex approved in 1997 and the Council at pre-application stage had no objection to this in principle³¹.

Link and existing annex outbuilding

7.13 The Council's pre-application advice raised no objection to the principle of a linking building between the original listed part of Cotlee and the c.1997 freestanding annex. It is considered that the proposed link would be an enhancement by way of camouflaging the unsympathetic ground floor east elevation shown in Figure 9.



Fig.11 Cotlee (left) with 1997 annex (right) showing location of the proposed link

³¹ The surviving timber-framing in the kitchen will be unaffected by the proposals.

7.14 It is proposed that the facade of new link and the existing facade of the annex be identically clad in vertical boarding, to unite these two potentially disparate elements while improving thermal efficiency and clearly distinguishing the modern work from the original listed building. The Council's pre-application advice raised no objection to improvements of this nature as these would not affect the heritage significance of Cotlee.

7.15 The form and scale of the proposed single-storey flat-roofed link would be modest and visually clearly subservient to the listed building (taking the original form of Cotlee, Mittecott and Byeways as a single two-storey pitched roofed structure) and further, the cladding proposed would be visually recessive and not prominent within the curtilage nor in the very confined oblique view from the existing access to Groton Street.

7.16 Reference to the minimal visual impact from the street and the relationship to setting is set out in Section 8 below but generally overall, it contended that the impact of the proposal on the street scene and the setting of the front facade of the listed building would be negligible.

7.17 As referred to in paragraph 3.15 above, in terms of orientation, distance and existing landscaping, there would be no impact on the character appearance or setting of nearby listed buildings.

7.18 Overall, the physical intervention to the fabric of heritage significance to the listed building would be minimal, and therefore would represent the lowest level of less than substantial harm, and in accordance with both the NPPF and the NPPG it is considered that the public benefit would relate to the maintenance of the building for future, flexible family occupation, particularly in relation to the frequent minor changes of level within Cotlee and the implications for satisfactory day-to-day use and circulation; and the relevant paragraphs of the NPPG, or quoted as follows.

Public benefit

7.19 Where development proposals will lead to less than substantial harm as is considered to be the case in this instance; paragraph 202 of the NPPF [07-2021] requires the special interest to be weighed against the public benefits, including securing optimum viable use. This will be the responsibility of the Council as planning authority to determine, notwithstanding the pre-application advice of November 2022 regarding acceptability in principle.

7.20 The definition of optimum viable use is set out in the Government's online National Planning Practice Guidance (NPPG)³² under the section headed 'Decision-taking: historic environment' sub-heading 'What is meant by the term public benefits?' states as follows:

"Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (paragraph 7). (...) Public benefits do not always have to be visible or accessible to the public in order to be genuine public benefits (and public benefits) ...may include heritage benefits, such as: sustaining or enhancing the significance of a heritage asset and the contribution of its setting; and securing the optimum viable use of a heritage asset in support of its long-term conservation".

7.21 As defined in Footnote 29 above, the present dwelling has a number of minor changes of level that make traversing the ground floor (and first floor) awkward and less convenient than a modern dwelling but form part of the character of Cotlee and these are not proposed to be altered; however it is considered that investment in the refurbishment and partial resolution of day-to-day convenience arising from the several minor changes of level to the existing ground floor to would ensure a continuous uninterrupted ground level between the existing kitchen, the proposed link and the existing annex.

³² NPPG Paragraph: 020 Reference ID: 18a-020-20140306 - Revision date: 06 03 2014

7.22 It is contended that this will contribute of the convenient occupation of the building as one of special architectural or historic interest on the National Heritage List thus furthering the aims of sustainability and enhancement cited in the NPPG thus constituting a public benefit while providing a fully functioning, efficiently arranged dwelling suitable for contemporary family needs.

8. SETTING

8.1 The NPPF requires the proponents of proposals to evaluate their impact on the setting of those heritage assets considered likely to be affected by them but that such consideration should be proportionate.

8.2 As already noted in paragraph 3.14, the location of the proposed single storey link would be about 93M to the west-northwest of the parish church and concealed³³ by interposing curtilage landscaping and boundary treatments while the Old School House about 29M to the west-southwest sits well-recessed in a landscaped curtilage while Crown House to the north of Byways is completely obscured.

8.3 Advice regarding the setting of heritage assets is set out in Historic England's '*Historic Environment Good Practice Advice in Planning 3*' [HEAN 3]³⁴. The aim is to assist in implementing historic environment policy in the NPPF, but paragraph 19 (p.8) of HEAN3 also states that the implications of development affecting the setting of heritage assets should be considered on a case-by-case basis.

8.4. Setting is seen as separate from concepts of curtilage, character and context:

- o curtilage describes an area around a building defined by consideration of ownership, both past and present, functional association and layout.
- o setting includes (but generally may in some instances be more extensive than) the curtilage, but for the purposes of this Assessment, the setting is taken to relate to the east-north-easterly view in Groton Street with no evident more distant views.

8.5 HEAN 3 defines the character of a historic place as the sum of all its attributes: its relationships with people, now and through time; its visual aspects; and the features, materials, and spaces associated with its history, including its original configuration and subsequent losses and changes. In the context the site of the proposed single-storey link it is considered that this visual relationship would be negligible as illustrated in Figures 12-14 below.

8.6 The NPPF (07-2021) makes it clear that while the setting of a heritage asset is the surroundings in which it is experienced, its extent is not always fixed and may make a positive or negative contribution to significance or may be neutral in its effect and this may change over time.

8.7 Paragraph 18 (p.8) of HEAN 3 states that protection of the setting of heritage assets need not prevent change; indeed, change may be positive and should be considered in relation to the NPPF (07-2021) paragraph 206.

8.8 Examination of the nature, extent and levels of the significance of heritage assets is encouraged by HEAN 3 but this should be considered proportionately as it is recognizing that where a development proposal is not likely to be prominent or intrusive (as is considered to be the case here) the effects on setting may often be limited to the immediate surroundings.

8.9 The proposal would be set back within the curtilage with the 1997 annex forming a background. It is therefore considered that no material heritage impact on the setting or heritage significance of Cottlee³⁵ would arise from the proposal.

³³ With the exception of the upper part of the tower

³⁴ Published by English Heritage in March 2015 and revised and re-published (Version 2) by Historic England December 2017

³⁵ ...and by extension Mittecott or Byways as on listing entry,

8.10 The single-storey scale and massing of the proposed link will not materially impact on the scale or massing to those existing modern primarily undistinguished two-storey dwellings to the immediate east and south and the configuration of the site is such that the proposed link will be slightly in recess from the street scene and visually recessive in the traditional facing materials it will employ.

Views & vistas

8.11 In considering the matter of setting and villagescape, two general visual principles are considered to apply namely:

[a] strategic or specifically significant views are sometimes defined (but often not) in planning policy documents and may have a heritage value in making places memorable but although such places may be experienced from single viewpoints, streetscapes are appreciated dynamically and viewpoints constantly change as the public realm is traversed. Buildings or sites that may appear prominent in one location can promptly 'disappear' merely, for example, by the viewer crossing from one side of a street to the other or walking a short distance from one specific viewpoint to another.

[b] in some instances there may be screening (e.g., an interposed foreground building, wall or boundary hedge) between the viewer and the subject. If the screening is close to the viewer the subject behind will frequently be completely obscured. As distance increases it is possible that more of the subject will be revealed at least in part, but if the distance increases significantly the corresponding visual impact is also reduced.

8.12 It is noted that there would be little direct inter-visibility between the site of the proposal and Groton Road resulting from the rising rearward topography of the site, the prominence of Cotlee in the street scene, the narrow vehicular access and the curtilage boundary treatment to the south.

8.13 It is calculated that the site location of the link would only be visible from the vehicular access for a distance (north to south) of approximately 6.2M with no material impact on the setting of the listed building seen from the road and thus that both principles 8.11 [a] and [b] above would apply.



Fig.12 View in Groton Road with the vehicular access to Cotlee and the house above the road with the site of the link obscured by curtilage boundary landscaping to the south



Fig.13 View in Groton Road with the vehicular access aligned on the 1997 annex to the rear of the curtilage to Cotelee and the site of the link obscured by the listed building



Fig.14 View in Groton Road with the vehicular access and view to the east-southeast with the rearward 1997 annex almost entirely obscured and the location of the link entirely obscured by the listed building

9. SUMMARY & CONCLUSIONS

9.1 Cotlee was Listed Grade 2 on 10th July 1980 and is perfunctorily described in the list description as being part of a 15th to 16th century hall house, later in the early 20th century sub-divided into numerous small tenements with little official recognition of (or reference to) its original single use or early adaptation as an inn or the numerous unspecified 20th century alterations, demolitions etc.³⁶

9.2 In that era designation descriptions served more for the purposes of identification than as an objective evaluation of the degrees of significance and/or the component features contributing to a building's special architectural and historic interest.

8.3 The unrevised listing description of Cotlee which is now approximately 43 years old does not represent current best practice regarding designation and the assessment of relative significance which, by national and international conventions, it would be considered as no more than of medium/moderate heritage importance.

8.4 The proposed physical works of alteration to the listed building to form a link to the intended extension are very minor in extent relating to part of a modern internal wall dividing the kitchen from a lobby flanked by a larder and WC; and part of the ground floor external wall understood to have been under-built after 1945 to remedy semi-dereliction and consequent structural movement. None of the fabric proposed to be removed is considered to be of heritage significance in relation to Cotlee (or the three listed properties as a whole).

8.5 It is considered that the proposals would retain those attributes that formed the basis of listing for special architectural or historic interest in 1980, particularly the principal frontage elevated above Groton Street:

- remove the deleterious 20th century alterations to the ground floor of the east gable end elevation (including the unsympathetic and discordant modern re-fenestration; and,
- provide a more efficient and practical domestic layout to meet the needs of contemporary living in accord with the long-established principles set out in paragraph 4.2 above.

8.6 The proposals are considered would be likely to amount to [a very low level of] less than substantial harm as defined under paragraph 202 of the NPPF [07-2021]. Where this is the case, the special interest is required to be weighed against the public benefits, including securing optimum viable use as made explicit in the on-line National Planning Policy Guide [NPPG].

8.7 Under 'Decision-taking: historic environment' the NPPG states that this "may include heritage benefits, such as: sustaining or enhancing the significance of a heritage asset and the contribution of its setting; (...) and securing the optimum viable use of a heritage asset in support of its long-term conservation".

8.8 It is contended that the proposals would help sustain the building for the long-term in terms of its conservation and long-term maintenance and thus represent a significant public benefit to this part of Groton.

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May 2023

³⁶ Some of which post-date the listing