



JOHN MOORE HERITAGE SERVICES

HERITAGE IMPACT ASSESSMENT

ON

STURMER HALL,

STURMER, ESSEX

APRIL 2025

REPORT PREPARED BY Tom Gouldbourne

ILLUSTRATION BY Tom Gouldbourne
Christopher Whitehead

EDITED BY John Moore

AUTHORISED BY John Moore

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ENQUIRIES TO John Moore Heritage Services
Unit 10, Wheatley Business Centre,
Old London Road,
Wheatley
OX33 1XW



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Summary

John Moore Heritage Services carried out a heritage impact assessment on the proposed development of a S.E.N.D school at Sturmer Hall, Sturmer, Essex.

The assessment was conducted in order to determine the potential impacts of the proposed development on built heritage and buried archaeological remains. A search of the available databases, supplemented with research by JMHS, identified a total of 42 archaeological sites and findspots within the search area.

Most pertinently, the Sturmer Hall Moated Site and Mill Complex scheduled monument is located within the proposal site. The site is also located adjacent to the Grade I listed Church of St Mary the Virgin. Together these monuments reflect the proposal site's position at the centre of the medieval manor of Sturmer. This manor is first referenced in the 10th century, while the archaeological remains embodied within the scheduled monument are likely to contain a range of information relating to the development and use of this high status medieval site.

Due to the sensitive location and the scale of the proposed development it is predicted that a level of harm is likely to arise as a result of the proposals; the predicted degree of harm to the designated heritage assets identified is Less than substantial. This has been mitigated to a certain extent through carefully considered design, however based on the predicted level of harm the public benefits of the scheme must be weighed against the potential harm to heritage.

In regards to archaeological remains outside of the scheduled area, the proposal site has the potential to contain remains of at least moderate significance, dating from the Late Prehistoric period onwards, though there is particular potential for remains dating to the medieval period. Groundworks associated with the construction of the proposed development will have the potential to truncate or remove any buried remains present within the site, reducing or removing their significance entirely. However, despite the archaeological significance of the scheduled monument, the wider archaeology of the proposal site is not well understood. As such further investigation should be undertaken in order to clarify the presence and significance of any archaeological remains within the site, in line with the NPPF and local planning policy. The details of any further investigation should be determined in discussion with Historic England and the local planning authority.

1 INTRODUCTION

1.1 *Origins of the Report*

John Moore Heritage Services was commissioned by Meadows Services Ltd to undertake a Heritage Impact Assessment on proposed redevelopment at Sturmer Hall, Church Walk, Haverhill (hereafter referred to as *the site* or *the proposal site*).

The principal aim of this assessment is to determine any potential effects of the proposed development on the significance and setting of the designated and non-designated heritage assets located within the site's boundary and the wider landscape.

1.2 *Location and Description*

The proposal site is located to the west of Sturmer village, approximately 2km south east of Haverhill; the site sits apart from the rest of the settlement and is accessed along Church Walk from the A1017 (centred TL 68954 43867). The application boundary is irregular and falls within a larger sub-rectangular enclosure that encompasses the buildings of Sturmer Hall and St Mary the Virgin. Sturmer Hall is currently in use as a hotel and wedding venue.

The site is located in Sturmer Civil Parish, in the Braintree District of Essex, close to the border with Suffolk.

In regards to heritage designations the *Sturmer Hall moated site and mill complex* Scheduled Monument (List Entry Number: 1012094) is located within the application boundary. The monument is split into two sections, The northern scheduled area contains the remains of the moated site and lies entirely within the application boundary while the southern scheduled area lies approximately 35m south, mostly outside the application boundary. Located adjacent to the proposal site, though outside its boundary is *Church of St Mary the Virgin*, a Grade I listed building (List Entry Number: 1122274).



Plate 1: A panoramic view of the scheduled monument

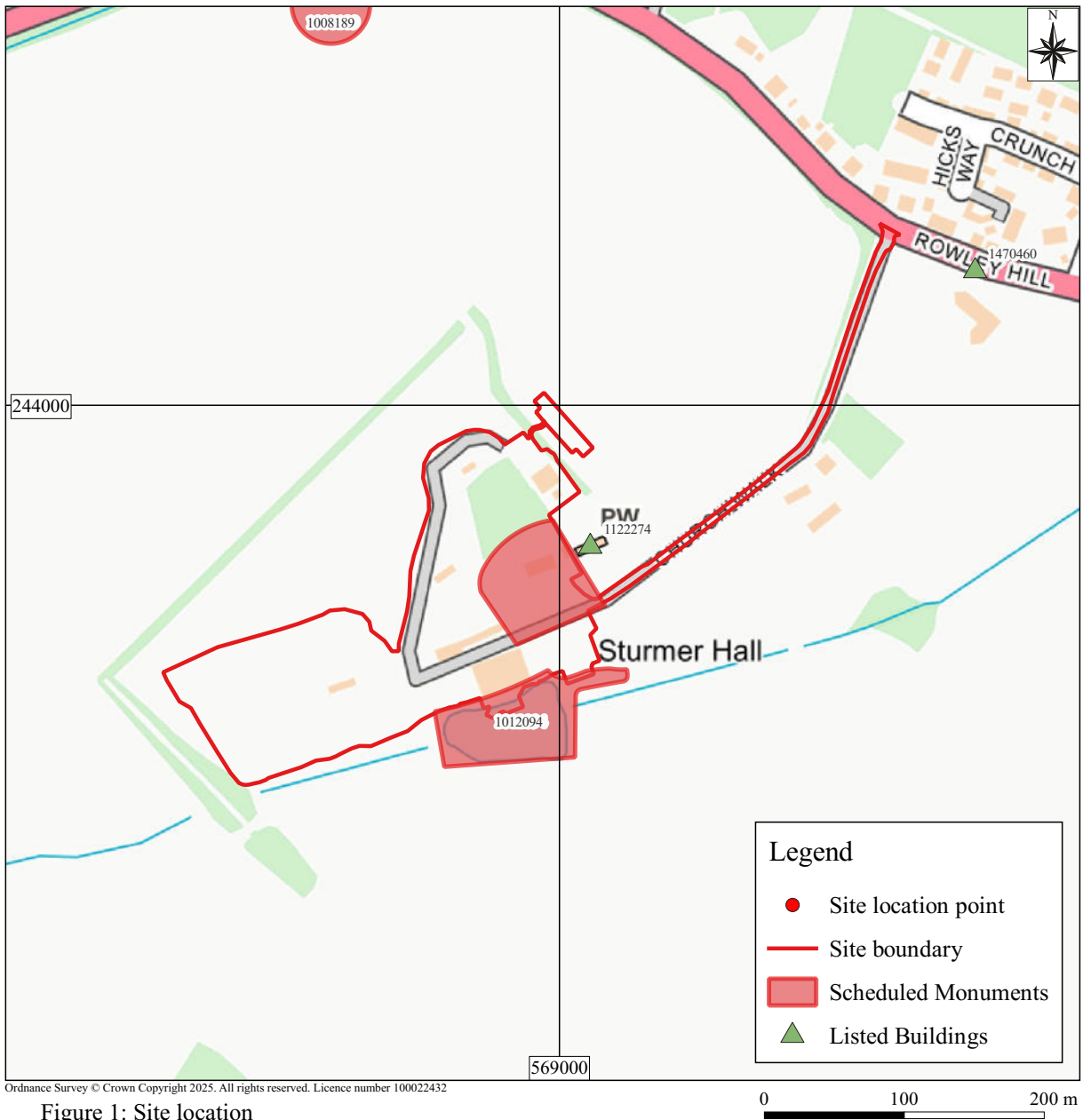
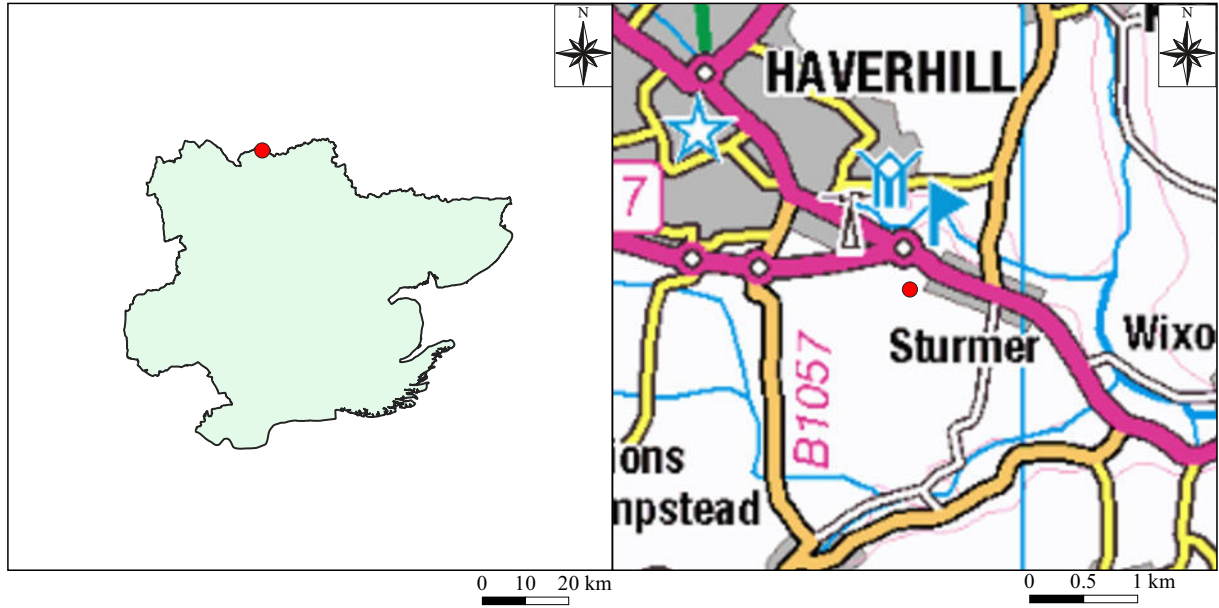


Figure 1: Site location

1.3 Geology and Topography

The proposal site is located between 65 to 80m AOD on the northern slope of a small valley that contains a tributary of the River Stour.

The underlying bedrock geology is the Lewes Nodular Chalk Formation and Seaford Chalk Formation, overlain by superficial deposits of Lowestoft Formation diamicton¹. The soils are characterised as lime-rich loamy and clayey soils with impeded drainage².

1.4 Proposed Development

The proposal is for the construction of a new SEND school to accommodate *c.*40 students. The main school building is proposed in an area of the site that is currently hard standing surrounded by grass bunds, which will be retained. The existing outbuildings are proposed for conversion into a spa facility, for use by the school and wider public. The existing hall is proposed for use as admin offices for the school. A number of additional educational spaces are proposed for the wider grounds, in addition to accommodation lodges. Additional car parking and access routes are also proposed.

2 PLANNING POLICY BACKGROUND

2.1 National Planning Guidelines and Policies

Section 16 of the revised National Planning Policy Framework (NPPF) provides guidance related to heritage issues within the planning process. The chapter is titled Conserving and Enhancing the Historic Environment. This has been paired with a Planning Practice Guidance (PPG), initially published in 2014 and subsequently updated in 2019.

The relevant section is broken down into three separate parts, the latter two of which have their own sub-headings. The first part, Paragraphs 202-206, contains definitions and classifications, along with designations of heritage sites. It concerns the production and implementation of a policy strategy and the requirements of this for Local Authorities. The next group of Paragraphs 207-211 are included under Proposals Affecting Heritage Assets. The final group of Paragraphs 212-221 is sub-titled Considering Potential Impact and is concerned with the impact of any proposals on heritage assets. The full document can be viewed on the government website: <https://www.gov.uk/guidance/national-planning-policy-framework>.

Paragraph 018 of the PPG confirms that within each category of harm, the extent of harm may differ and should be clearly articulated. The tables in the appendix at the end of the report are designed to assist with the description of the level of potential harm. However, it should be borne in mind that it is the degree of harm to the asset's significance rather than the scale of development that is to be assessed.

1 <https://mapapps2.bgs.ac.uk/geoindex/home.html>

2 <https://www.landis.org.uk/soilscapes/>

2.2 Local Planning Policy

The *Planning and Compulsory Purchase Act 2004* (Section 38 (6)), and the *NPPF* makes provision for the use of a development plan in determining planning applications, and decision makers must apply the relevant policies in the local development plan and the *National Planning Policy Framework*.

The Braintree Local Plan 2033 was adopted by the district on 22nd February 2021. Policies of relevance to this report comprise:

Policy LPP 57

Heritage Assets and their Settings

Development of internal, or external alterations, or extensions, to a listed building or listed structure (including any structures defined as having equivalent status due to being situated within the curtilage of a listed building and locally listed heritage assets) and changes of use will be permitted when all the following criteria are met:

For designated heritage assets:

The development meets the tests set out in national policy.

For all heritage assets:

- a. The works or uses include the use of appropriate materials and finishes
- b. The application submitted contains details of the significance of the heritage asset, within a Heritage Statement which should include any contribution made by their setting
- c. There may be a requirement for appropriate specialist recording to be carried out prior to the change of use, demolition or conversion of a listed building or associated historic building

The Council will seek to preserve and enhance the immediate settings of heritage assets by appropriate control over the development, design and use of adjoining land

Policy LPP 59

Archaeological Evaluation, Excavation and Recording

Where important archaeological remains are thought to be at risk from development, or if the development could impact on a Scheduled Monument or Registered Park and Garden, the developer will be required to arrange for an archaeological evaluation of the site to be undertaken and submitted as part of the planning application. The Essex Historic Environment Record should be the primary source for assessment for archaeological potential. The evaluation will assess the character, significance and extent of the archaeological remains and will allow an informed decision to be made on the planning application. Such assessments should be proportionate to the importance of the site and a programme of archaeological investigation may be necessary for sites likely to contain significant archaeology.

Planning permission will not be granted if the remains identified are of sufficient importance to be preserved in situ and cannot be so preserved in the context of the development proposed, taking account of the necessary construction techniques to be used.

Where archaeological potential is identified but there is no overriding case for any remains to be preserved in situ, development which would destroy or disturb potential remains will be permitted, subject to conditions ensuring an appropriate programme of archaeological investigation, recording, reporting and archiving, prior to development commencing. There will be a requirement to make the result of these investigations publicly accessible.

3 HERITAGE IMPACT ASSESSMENT METHODOLOGY

3.1 Heritage Impact Assessment Aims and Objectives

The primary aim of this Heritage Impact Assessment is to provide an independent professional appraisal of the potential impact to surrounding designated and non-heritage assets as a result of development within the proposal site. This follows the Government guidance in NPPF by presenting a synthesis of the available heritage data and its significance at an early stage in the planning process including the Chartered Institute for Archaeologists (Cifa) Standard definition of a heritage impact assessment (Cifa 2020). The information derived from the study has been used:

- To identify any heritage assets recorded within the boundaries of the site;
- To assess the potential for the discovery of additional heritage assets within the boundaries of the site;
- To identify any heritage assets whose setting may be associated with the site;
- To understand the potential significance of the assets identified in a local, regional and national context;
- To consider possible effects, whether adverse or positive, of the scheme on identified heritage assets and on the significance of these assets, in particular the impact on buried archaeological remains within the site.
- To identify current limitations and future areas of work to be undertaken.

3.2 Heritage Impact Assessment Sources

The format and contents of this section of the report are an adaptation of the standards outlined in the Chartered Institute for Archaeologists' guidance paper for Heritage Impact Assessments or Desk-based Assessments (Cifa 2017 updated 2020). The work has involved the consultation of the available databases and historical maps, supplemented with a site visit.

The principal sources consulted in assessing this site were:

- The National Heritage List for England for designated heritage assets
- The Portable Antiquities Scheme Database
- The Essex Historic Environment Record (HER) for a search radius of 1km from the site
- The Essex Record Office for the consultation of historic maps and documents
- Environment Agency LiDAR data
- Archaeological source material (published and unpublished)
- Site visit

3.3 Heritage Impact Assessment Modelling and Analysis

There has been no intrusive archaeological work carried out at the proposal site. The assessment of its potential has, therefore, relied on predictive modelling based on the known distribution of remains within a 1km radius of TL 68954 43867.

The information about heritage assets both designated (Scheduled Monuments, Listed Buildings and others, see part 2.1) and non-designated have been collated to demonstrate the archaeological and historic development of the landscape and thus the potential for surviving heritage assets within the vicinity of the proposal site.

The available evidence is derived from casual finds, archaeological investigations, standing buildings and historical records located throughout the search area. The assessment of the likely condition of any potential archaeological remains has relied upon a study of the available historical maps and observations made during the site walkover, which provide evidence for the impact of previous land-use on the site.

3.4 Assessment of Harm

National and local planning policy requires the effect of a development on the identified heritage assets to be outlined. Assessment of the level of harm caused to a heritage asset (either designated or non-designated) is reliant on understanding the significance of the heritage asset at risk of impact and the extent to which the proposal site contributes to this significance. The relationship between these and any perceived harm that the development would cause can then be assessed (HE 2017, 2019; see Appendix I).

A proposed development may have no impact on the identified assets or it may sustain and enhance their significance.

Where harm to a designated heritage asset is anticipated the level of harm needs to be established. As outlined in the NPPF these are *less than substantial harm*, *substantial harm* or *total loss*. Approvals that result in substantial harm to a designated heritage asset should be wholly exceptional, and justified by a range of significant factors. Where less than substantial harm is identified the harms must be weighed against the public benefits of the proposal.

Where harm to a non-designated heritage asset is anticipated the scale of any harm to the significance of the heritage asset should be outlined, in order to allow a balanced judgement to be made.

Paragraph 018 of the PPG confirms that within each category of harm, the extent of harm may differ and should be clearly articulated. The tables in the appendix at the end of the report are designed to assist with the description of the level of potential harm.

3.5 Limitations of the Heritage Impact Assessment

In regards to predicting the potential for, and distribution of, archaeological remains it is important to note that the distribution of archaeological sites represents the extent of current knowledge and is the product of chance and investigation in the search area. For this reason, apparently blank zones should not be automatically regarded as being devoid of remains.

There has been a relatively low level of formal archaeological investigation undertaken within the search area, with evidence largely derived from chance finds, historic sources and remote sources such as LiDAR and aerial photographs.

The search area is largely agricultural, which is conducive to the analysis of aerial photographs and LiDAR data. While various factors impact the reliability and utility of these data sources, they represent a useful source of information where other forms of archaeological investigation have been more limited.

4 HERITAGE BACKGROUND

The sources listed in Section 2.2 have been consulted in order to develop the archaeological and historical background of the site and search area, which is summarised here.

The principal sources of data are the Essex Historic Environment Record, National Heritage List for England, and Portable Antiquities Scheme (PAS) database. This has been supplemented with an assessment of other documentary sources, historic map regression, analysis of LiDAR imagery and aerial photographs of the search area, undertaken by JMHS.

The following prehistoric and historical periods are used in the assessment and analysis of this report.

Prehistoric

Palaeolithic	c. 800,000 - 10,000 BC
Mesolithic	c. 10,000 - 4,400 BC
Neolithic	c. 4,400 - 2,500 BC
Bronze Age	c. 2,500 - 800 BC
Iron Age	c. 800 BC - AD 43

Historic

Roman (Romano-British) Period	AD 43 - AD 410
Early Medieval Period	AD 410 - AD 1066
Medieval Period	AD 1066 - AD 1542
Post Medieval Period	AD 1542 - AD 1900
Modern	1901 onwards

4.1 Historical and Archaeological Background

Baseline historic environment data has been assessed up to 1km from the proposal site with the results organised by period, from earliest to latest. For ease of reference each heritage asset identified has been allocated a unique JMHS number. This is included in the heritage gazetteer provided in Section 7 and marked on Figure 2.

Bronze Age

An extant Late Neolithic to Bronze Age bowl barrow is located c. 300m north of the proposal site (**JMHS 1**, NHLE 1008189, MEX 5708: TL 68837 44286); the barrow is a Scheduled Monument, listed as *Bowl barrow 500m north-west of Sturmer Hall*. The bowl barrow was first designated on 10th August 1923, with revision on 15th November 1993 (List entry number 1008189). The full list entry is available on the

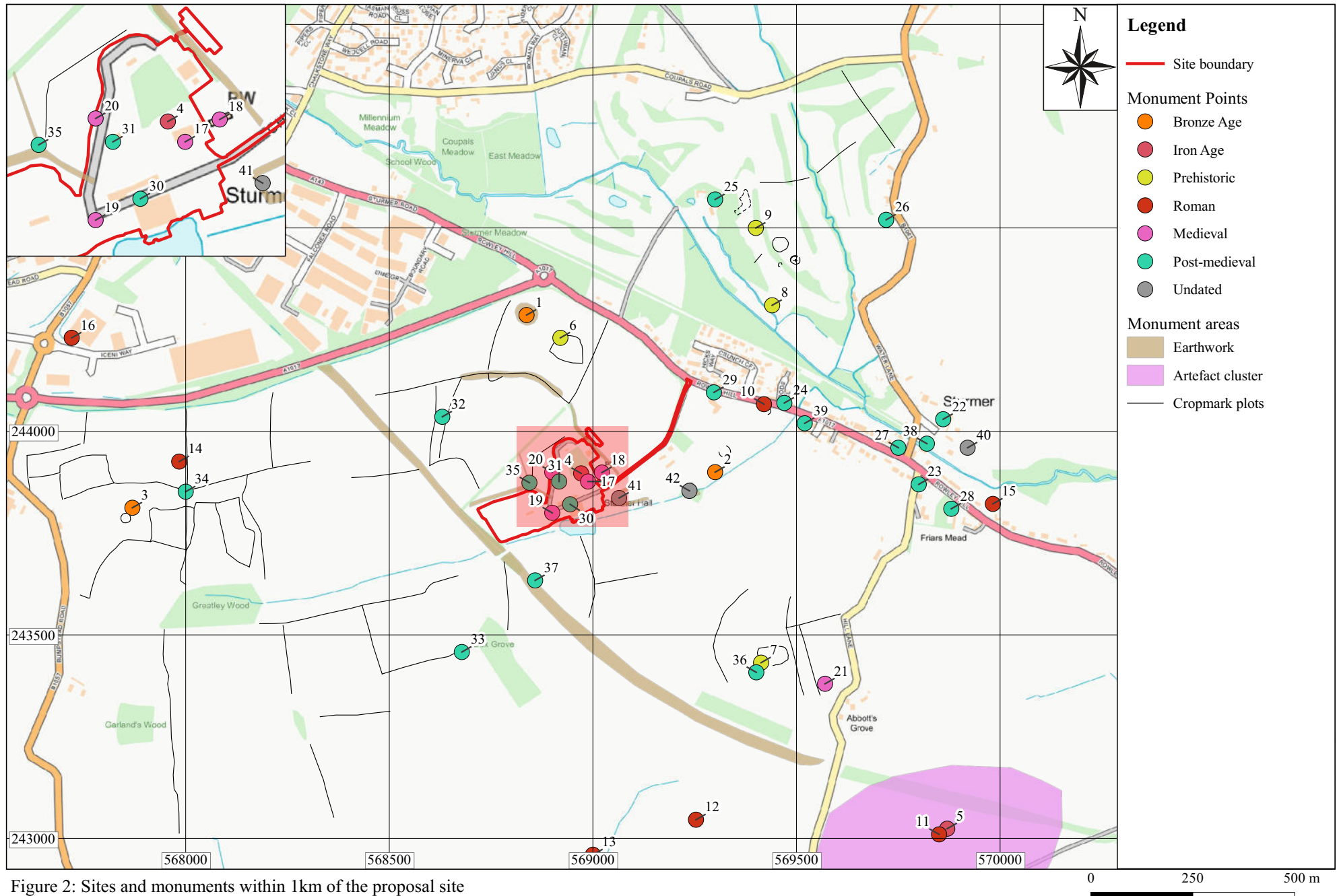


Figure 2: Sites and monuments within 1km of the proposal site

Historic England website³, though a brief summary is as follows: *The monument includes a bowl barrow situated on a west facing slope overlooking the River Stour. The barrow is visible as an earthen mound which measures 48m in diameter and 2.5m high. Although no longer visible at ground level, a ditch, from which material was excavated during its construction, surrounds the mound. The ditch has become infilled but survives as a buried feature 2m wide.* The site of a further barrow is visible as a cropmark c.290m north east of the proposal site (**JMHS 2**, MEX28514: centred TL 693 439). The cropmark of a ring ditch c.25m in diameter is also visible approximately 850m west of the proposal site (**JMHS 3**, Google Earth 2018: TL 67852 43786).

Iron Age

An Iron Age silver coin was found in the area of Sturmer Hall in the late 20th century and recorded on the Oxford University Celtic Coin Index (**JMHS 4**, CCI-953535: TL 68971 43897). A scatter of 12 metal objects largely dating to the late Iron Age has been found through metal detection over an area of c.11 hectares, 1 to 1.4km south east of the proposal site (**JMHS 5**, PAS multiple references: centred TL 69870 43024). These objects were found in the same area as a much denser scatter of Roman objects. The number of objects present is clearly indicative of some form of settlement, though there has been no formal archaeological investigation to clarify the character and extent of the remains.

Prehistoric

The cropmark of an enclosure of probable late Prehistoric date is visible approximately 180m north of the proposal site, adjacent to the scheduled bowl barrow (**JMHS 6**, MEX1051950: TL 6892 4423). The enclosure is irregularly shaped, measuring c.85m in length by c.65m in width.

The cropmarks of a possible late Prehistoric enclosure are visible approximately 550m south east of the proposal site (**JMHS 7**: MEX1051951: TL 6939 4341). The D-shaped enclosure is visible on aerial photographs; while undated, the morphology of the enclosure is indicative of a probable Prehistoric date.

The cropmarks of a possible Neolithic henge monument have been identified appropriately 550m north east of the proposal site (**JMHS 8**, MEX1052014: TL 6944 4431). The interpretation is not certain. However, the cross-trenches of a windmill are also seen within the enclosed area, therefore the 'henge' cropmarks may represent the remains of an enclosure associated with the windmill. Further features are located to the north east, including two possible ring ditches that were visible as low earthworks in the late 20th century (**JMHS 9**, MEX5879: centred TL 694 445); fieldwalking in the area of the earthworks resulted in the recovery of late Prehistoric worked flint.

Roman

The A1017 follows the former route of the Roman road from Godmanchester to Colchester (**JMHS 10**, MEX1051575: centred TL 69420 44067). Within the search area the route of the road is largely overlain by later roads and no archaeological investigation has been undertaken.

3 [Bowl barrow 500m north-west of Sturmer Hall, Sturmer - 1008189 | Historic England](#)

An extensive scatter of over 1000 Roman metal objects has been recorded over an area of c.11 hectares, 1 to 1.4km south east of the proposal site (**JMHS 11**, MEX1039454, PAS multiple references: centred TL 6985 4301). The objects largely date from the 2nd - 3rd century and include coins and military items; fieldwalking in the area has also identified building material and areas of darker soil suggestive of occupation. The quantity of material present is clearly indicative of a settlement, possibly the site of a villa.

A smaller number of dispersed finds have also been made as a result of metal detection within the search area. Finds made close to the larger cluster include two 3rd century copper alloy coins (**JMHS 12**, SF-58DC61: TL 69253 43046; **JMHS 13**, SF-A207F0: TL 69000 42960). A fragment of a Roman copper-alloy coin was also found through metal detection approximately 700m west of the proposal site (**JMHS 14**, SF-593265: TL 67984 43926); a copper alloy coin dating to the 3rd century was found approximately 900m east (**JMHS 15**, SF-596478: TL 69982 43822). A fieldwalking survey undertaken along the proposed route of the Haverhill Southern bypass identified concentrations of Roman pottery (**JMHS 16**, MEX42121: centred TL 6772 4423). The relatively low density of the finds suggests that they can be attributed to manuring and subsequent ploughing, rather than settlement activity.

Early Medieval

Sturmer is first recorded in the 10th century, in the Old English poem *The Battle of Maldon*. The battle is recorded as having taken place in 991 AD (though the date at which the poem was written is less certain). This record does however demonstrate that some form of settlement had been established at Sturmer by the 10th century. While little else is known of this early settlement, it is reasonable to suggest that the moated site and church at Sturmer Hall formed the core of the later medieval manor and as such was also the focal point of the early medieval settlement.

Medieval

The medieval manor is recorded in the Domesday survey of 1086 when it was split into two holdings, both held from the crown by Tihel of Helléan⁴. At the time of the survey the manor had a recorded population of 14 households, with land for five plough teams, 36 acres of meadow, a mill and beehives. Also recorded are two horses, 16 cattle, 30 pigs and 98 sheep.

At the core of the medieval manor was the moated site that remains partly extant to the present day (**JMHS 17**, List Entry Number: 1012094: TL 68988 43877) and the Church of St Mary the Virgin, located immediately to the north east (**JMHS 18**, List Entry Number: 1122274, MEX5791: TL 69022 43899). The moated site was associated with a 15th century hall house, latterly de-listed due to almost complete rebuilding in the 20th century (**JMHS 19**, MEX5778: centred TL 689 438). It is probable that the manorial complex was associated with a village, however no archaeological evidence of the settlement has been identified (**JMHS 20**, MEX5800: centred TL 689 439).

Within the wider environment cropmarks of a medieval or post-medieval farmstead are visible in fields opposite Homefield and Abbot's Grove, 600m south east of the proposal site (**JMHS 21**, MEX1051946: centred TL 6957 4338).

4 <https://opendomesday.org/place/TL6943/sturmer/> accessed 14/10/2025

Post-medieval

Post-medieval entries on the HER largely comprise extant historic buildings located within nearby Sturmer and the wider countryside. These are all listed buildings and include: Challices Farmhouse, an early 17th century lobby entry house (**JMHS 22**, MEX1004987: TL 6986 4403); Suffolk Edge, a 17th century timber framed house (**JMHS 23**: MEX1004985: TL 6980 4387); The Red Lion Public House (**JMHS 24**, MEX1004980: TL 6947 4407); 16th century barn, at Pope Mill farm (**JMHS 25**, MEX1004975: TL 6930 4457); 2 Kedington End, a 17th century timber-framed house (**JMHS 26**, MEX1004977: TL 6972 4452); Station Corner Cottage, a mid - 19th century pair of cottages (**JMHS 27**, MEX1004981: TL 6975 4396); Abbots Hall, an early 19th century house (**JMHS 28**, MEX1004986: TL 6988 4381). Also listed are a late 18th century milestone and an early 19th century milepost, 350m north east of the proposal site (**JMHS 29**, List entry number 1470460: TL 69297 44096).

The proposal site is depicted on maps in some detail from the 18th century onwards. The earliest map that provides useful information is John Chapman and Peter Andre's map of Essex, which dates to 1785 and shows the principal settlements, roads, watercourses and topography of the county. On this map Sturmer Hall is depicted in plan as an L-shaped structure; to the north and east of the building are two rectangular enclosures, presumably gardens or paddocks associated with the house. To the south west of the principal building are two smaller rectangular buildings, located within an enclosed courtyard. To the north is an illustrative view of St Mary the Virgin. Within the wider search area details are minimal; however, of note is Sturmer Wood, a woodland of c.80 hectares that is no longer present.



Figure 3: Extract from John Chapman and Peter Andre's map of Essex, 1785

The Ordnance Surveyor's Drawing of Boxstead dated to 1799 (OSD 146 serial 97; Figure 4) depicts the area in a broadly similar configuration, though the arrangement of the enclosures and access road to Sturmer Hall varies.

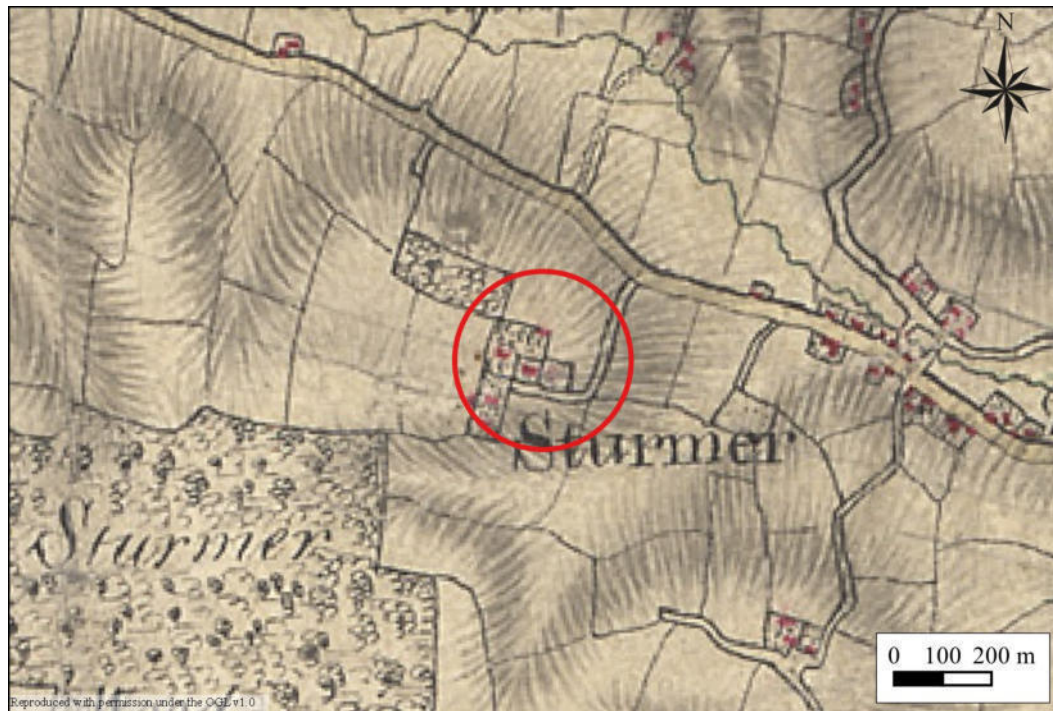


Figure 4: Extract from the Ordnance Survey Drawing of Boxstead, 1799

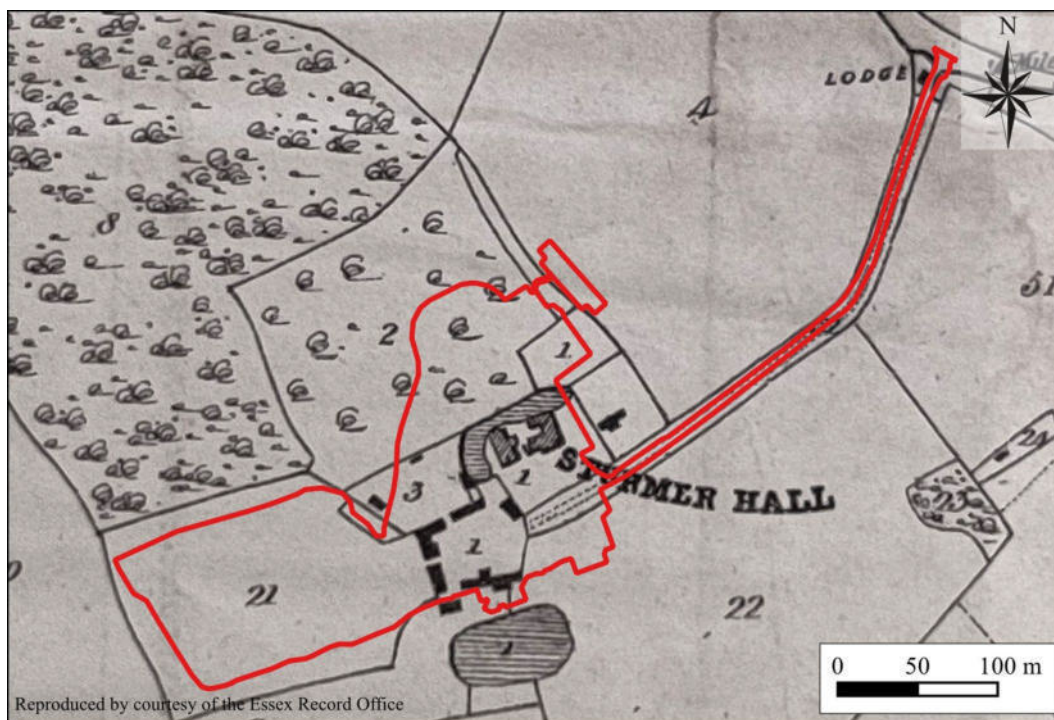


Figure 5: Sales Catalogue plan of 1819 (ERO: SALE/B2350)

The variation seen between the two maps is probably more indicative of the restrictions imposed by the scale of the maps and limitations of the cartographic surveys, rather than a reflection of the changing configuration of the proposal site. Sturmer Wood remains present to the south west, while the wider countryside is divided into a series of regular and more irregularly shaped fields.

A sales catalogue plan of 1819 shows the proposal site in much greater detail. Two buildings are seen within the moated site, presumably the principal buildings of Sturmer Hall; to the south west are six buildings arranged around the sides of a roughly square courtyard; the position and layout of these buildings around a courtyard suggests they are farm buildings associated with the estate (**JMHS 30**, SALE/B2350: centred TL 68944 43821). These buildings, including a small square enclosure located to the north east of the hall, and the pond to the south, are labelled *1: Homestead, Farm Yard, Garden, Pond etc...* To the west of the moat is a rectangular enclosure labelled *3: Old Orchard* containing two small rectangular buildings (**JMHS 31**, SALE/B2350: TL 68917 43877).

Surrounding the buildings of Sturmer Hall are a series of fields and enclosures; these vary in form, suggesting multiple phases of development. The irregular and curvilinear enclosure boundaries are perhaps earlier, while the more regular linear boundaries may indicate later subdivisions. Those within and nearest the proposal site include *2: Orchard*, *8: Home Wood*, *4: Low Field*, *21: Brick Kiln Field* and *22: Pond Meadow*. The boundaries of these enclosures have largely been removed at the present day; however, a series of cropmarks are visible on satellite imagery and aerial photographs taken by Historic England that represent the remains of some of these field boundaries. These are visible to the north east (**JMHS 32**, Google Earth 2018, Historic England 26832/032, 9 July 2010: centred TL 68630 44036) to the south (**JMHS 33**, Google Earth 2018: TL 68678 43458) and to the west (**JMHS 34**, Google Earth 2018: centred TL 68000 43852). A right-angled earthwork is visible on LiDAR imagery within the grounds of the proposal site (**JMHS 35**, EA LiDAR: TL 68844 43874) also corresponds with field boundaries depicted on the map. A very faint cropmark, possibly a post medieval field boundary, also cuts across the western side of enclosure **JMHS 7** (**JMHS 36**, MEX1051952: TL 6939 4341).

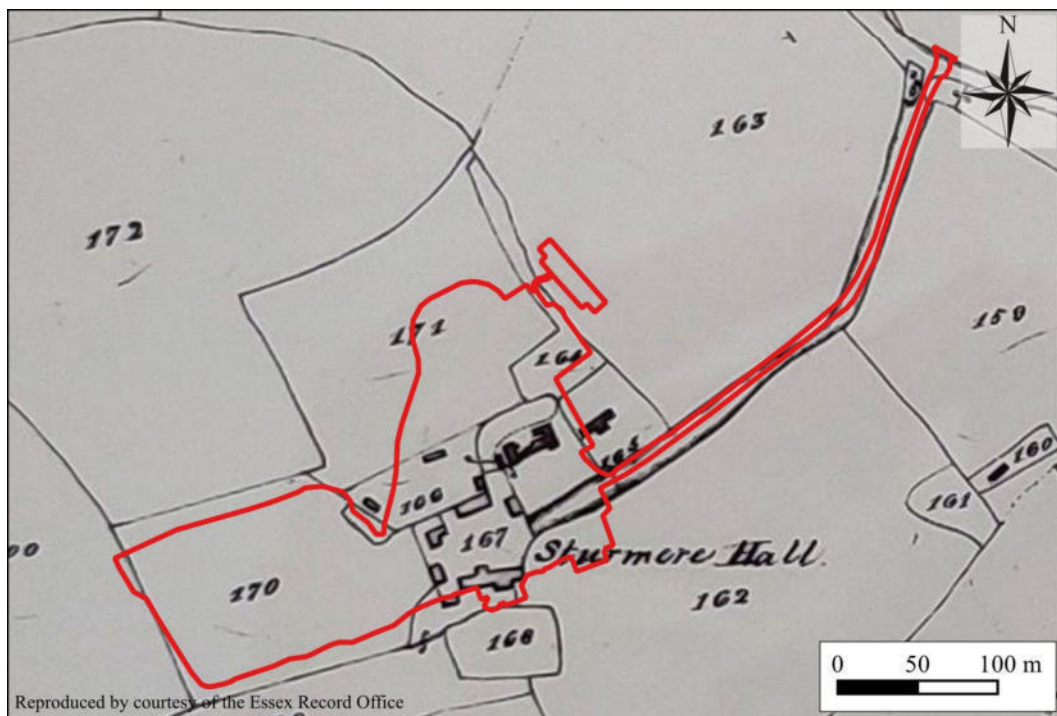


Figure 6: Sturmer title map of 1841 (ERO: D/CT 340B)

The Sturmer Tithe map of 1841 (Figure 6) depicts the proposal site in largely the same configuration as the earlier sales catalogue map; the only notable difference is the amalgamation of the two formerly separate buildings within the moat to form a single structure.

More changes are evident when the proposal site is depicted on the 1st Edition Ordnance Survey 25" scale map of 1878. The principal changes evident relate to further reorganisation of Sturmer Hall, where the eastern rear wing depicted on earlier maps has been removed. The increased detail of the map demonstrates that the front of the hall is accessed via a curved driveway; the front lawn is terraced. A reorganisation of the farm buildings to the south west of the moat has also taken place; this includes the removal of some of the earlier buildings and the expansion of the farmyard to the north. The majority of the farm buildings are stone (shaded pink), with a smaller number of wooden structures also present (shaded grey). The function of the buildings is uncertain, though the varied sizes and forms indicate that they are likely to represent a range of farm buildings including barns, shelter sheds and sties. The map also shows the rectangular enclosure to the north of the moat to be a walled garden or similar structure, with internal pathways. Within the wider area some of the field boundaries visible on the earlier maps have been removed and the area of woodland depicted on the 1819 map is no longer present.

Located to the south west of the proposal site is the route of the former Colne Valley Railway, which was opened in 1862 and ran from Haverhill to Chappel (JMHS 37, MEX22439: centred TL 68858 43634). The former railway is visible as a low earthwork crossing arable fields to the south west of the proposal site. Two well preserved embankments and a bridge survive immediately to the south of the site, where the railway crossed the valley bottom.

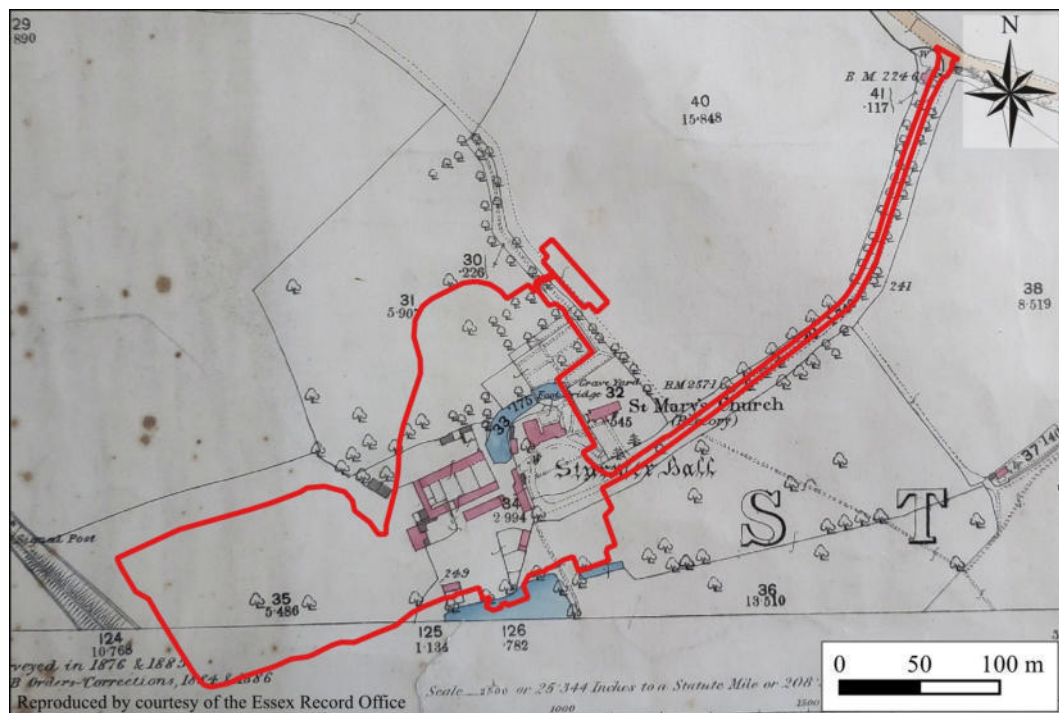


Figure 7: 1st Edition Ordnance Survey 25" County Series map of 1878

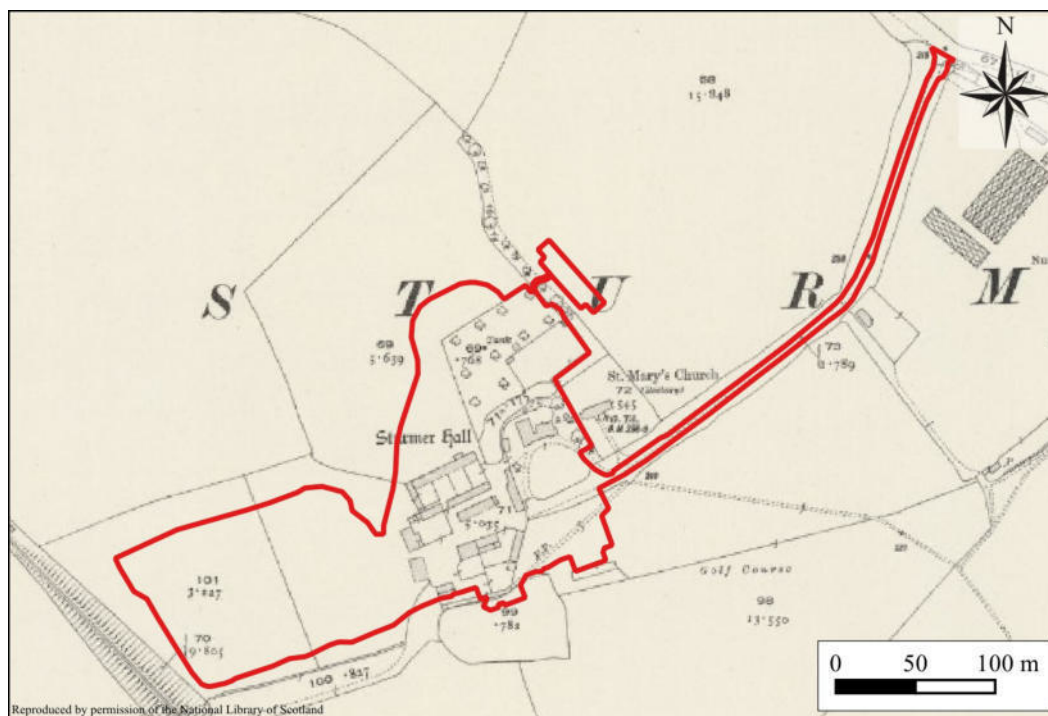


Figure 8: 1921 Edition, Ordnance Survey 25" map

The route of another railway, the Cambridge, Haverhill and Melford Branch of the Great Eastern Railway, runs in a north west – south east direction to the north east of the proposal site. Associated with the former railway was a station, located c.800m east of the site (**JMHS 38**, MEX1051938: TL 6982 4397).

Excavation undertaken 520m north east identified the foundations of an early 19th century building, originally two cottages and later the Spinning Room tea room (**JMHS 39**, MEX1050: TL 6952 4402)

Relatively little has changed when the proposal site is depicted on the OS edition of 1921 (Figure 8), the main difference being an increased density of development in the farm yard area to the south west of the moat. To the south east of the proposal site an area of fields is now marked *Golf Course*; this does not remain extant at the present day.

Undated

The cropmarks of ditches and pits have been identified to the west of Challice's Farm, 900m east of the proposal site (**JMHS 40**, MEX1051948: TL 6992 4396).

Visible on LiDAR imagery is a regular U-shaped bank, located within a field to the south of the church (**JMHS 41**, EA LiDAR: centred TL 69090 43842). The nature of the feature is uncertain, though it is overlaid by more modern enclosure boundaries within the field. Also visible is a small pond or former dam, located to the south east of the proposal site (**JMHS 42**, EA LiDAR: TL 69237 43854). This is located close to the position of a small rectangular enclosure containing a well that is depicted on late 19th century OS mapping of the area.

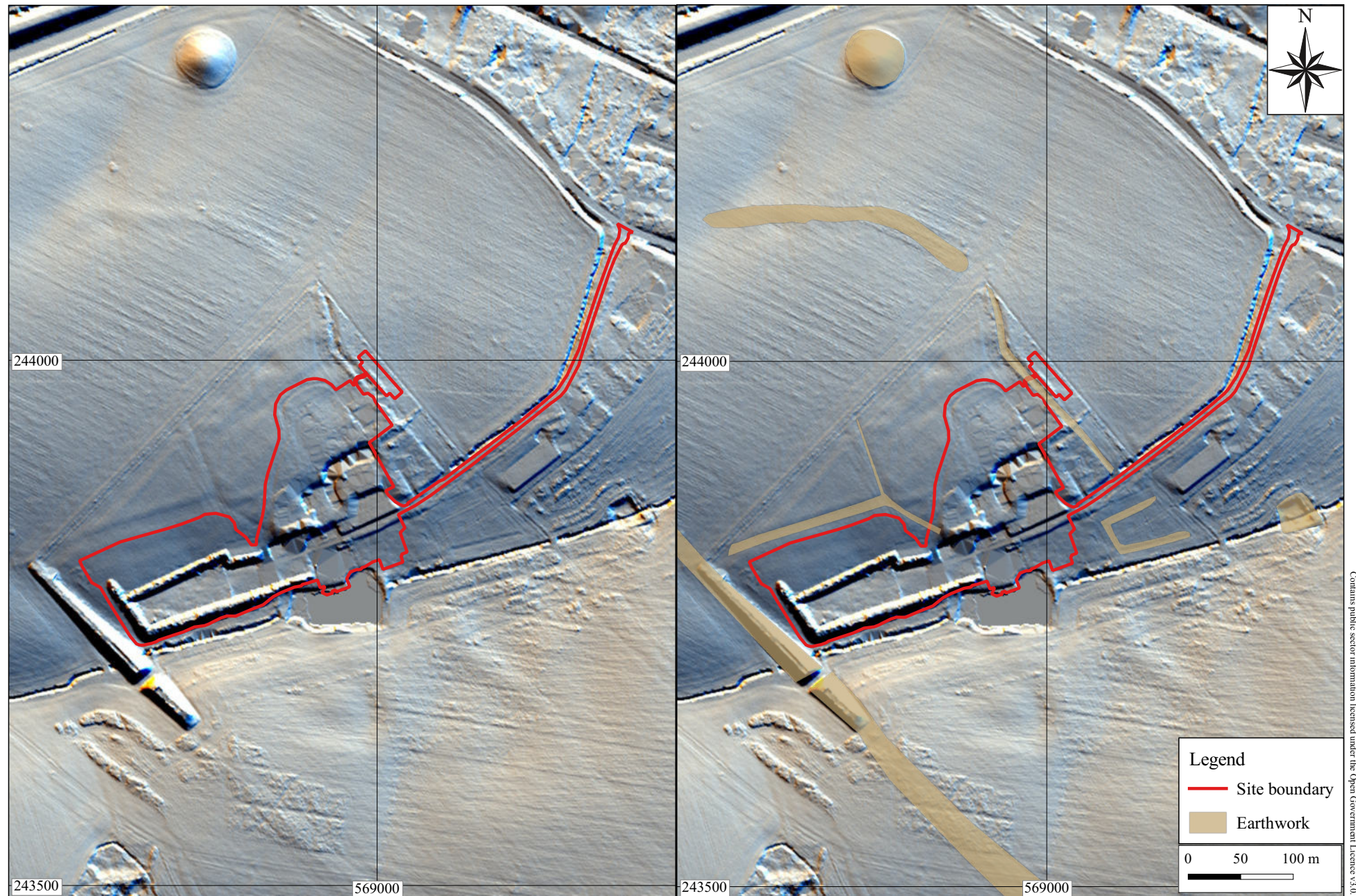


Figure 9: Environment Agency LIDAR Imagery. DTM at 1m resolution, processed using hillshade from multiple directions

4.2 Designated Heritage Assets

Discussed below are the designated heritage assets that have been identified as being at potential risk of harm as a result of the proposed development; a description of each asset is given, including its significance and its setting. A site visit was conducted on the 22nd October in order to assess the setting of these heritage assets and the potential impact of the proposed development on the identified setting.

The photographs included below are illustrative of the form, setting and condition of the assets at the time of the visit. At the time of the visit the surrounding deciduous vegetation was largely still in leaf, though some leaf drop had taken place, therefore the proposal site was close to its least visible; it is therefore likely that visibility would increase once leaf cover reduces later in the year.

4.2.1 Sturmer Hall Moated Site and Mill Complex

The Sturmer Hall moated site and mill complex is largely situated within the proposal site, though part of the mill pond extends beyond the site boundary (List Entry Number: 1012094⁵). The monument was first designated on the 31st January 1995, with amendment on the 28th January 2013.

Moated sites form a significant body of evidence relating to high-status medieval domestic settlement in England. These sites typically comprise wide, water filled ditches that partly or totally enclose a central platform or island; the island often held a substantial domestic dwelling.



Plate 2: The moat, looking south towards the rear elevation of Sturmer Hall

5 <https://historicengland.org.uk/listing/the-list/list-entry/1012094?section=official-list-entry>



Plate 3: Looking north across the building platform towards the moat

The moats appear to have primarily served as a status symbol rather than a defensive structure. The moated site at Sturmer is significant due to its association with the extant mill pond and adjacent church, which as a group provide clear evidence of the medieval manorial complex at Sturmer.

The monument at Sturmer is divided into two separate scheduled areas, each of approximately 0.5ha. The northern area encompasses the extant and buried remains of the moated site and central platform, while the southern area encompasses the mill complex, which comprises a sub-rectangular mill pond, with dam and backfilled tail race.

The moated site is partly occupied by Sturmer Hall (Plates 2 - 4); while the structure is located in the position of the historic hall, it was largely rebuilt in the late 20th century resulting in such an extensive loss of historic fabric that the building was de-listed. The moat itself is filled with water and surrounded by a range of mature trees (Plate 2, 3) and shrubs; there is some evidence of animal burrowing within the banks of the moat. To the south the scheduled area extends across the terraced lawn at the front of the hall (Plate 4, 5).

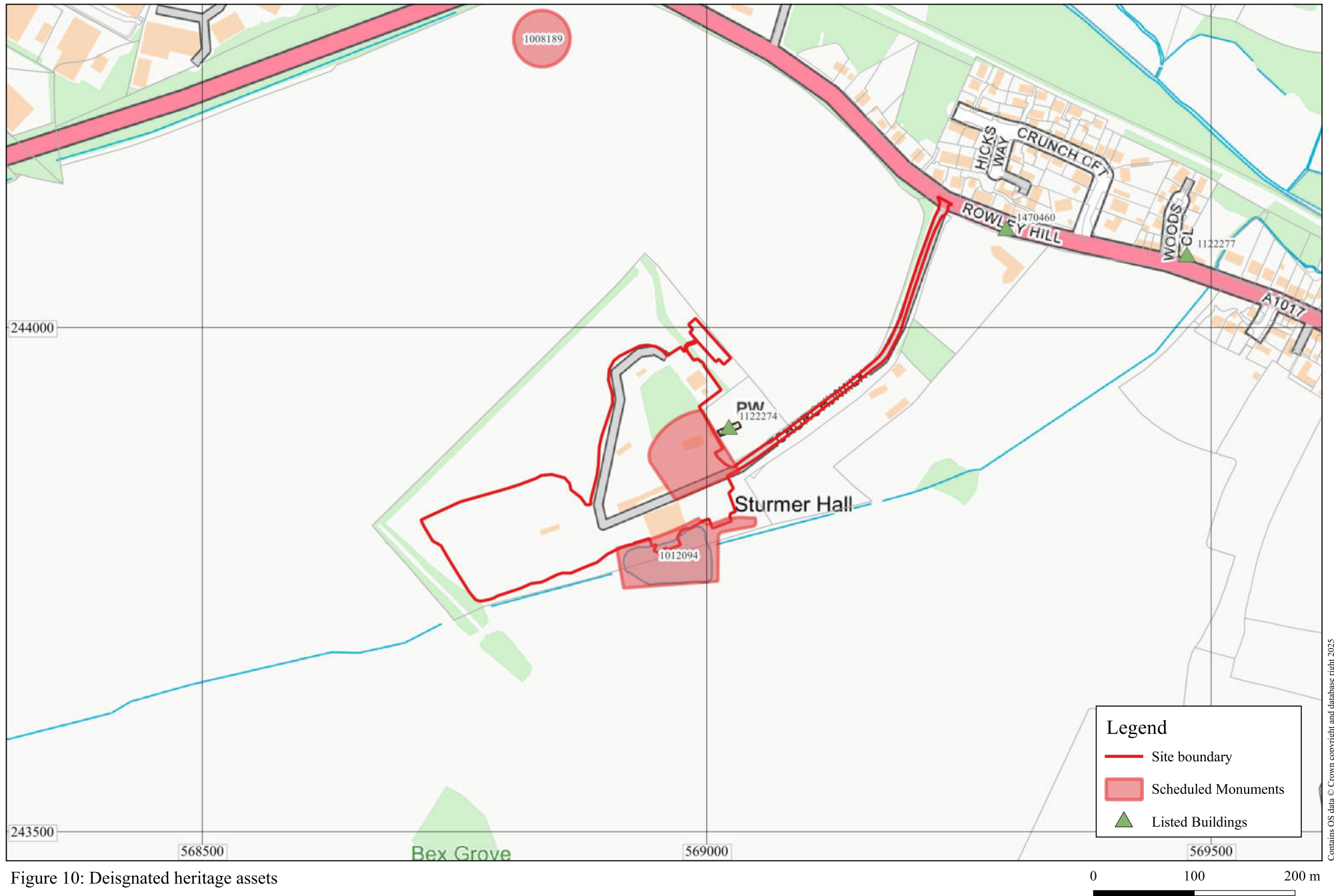


Figure 10: Designated heritage assets



Plate 4: Looking towards the scheduled monument (grassed area) from the driveway



Plate 5: Looking towards the millpond and wider countryside from within the moated area of the scheduled monument

The mill pond, located to the south of the moated site, sits on the edge of the manorial complex (Plate 6, 7). An area of lawn is present between the two areas of the scheduled monument (Plate 6); from this central point both parts of the scheduled monument are visible, as is the area of adjacent listed church (though the church itself is screened by trees) from which both areas are inter-visible. The northern edge of the mill pond is fringed with trees, creating an attractive vista. Located immediately

adjacent to the mill pond is a modern building associated with the current use of the site as a hotel and conference venue while to the south is farmland.



Plate 6: The mill pond, looking north west



Plate 7: The mill pond and adjacent modern building

The heritage significance of Sturmer Hall moated site and mill complex

The significance of the monument is outlined in detail within the list description, though a summary is also provided, which is detailed below:

The Sturmer Hall moated site and mill complex is scheduled for the following principal reasons:

Documentary Evidence: the evidence for the early medieval manorial complex originates in the C10 and Sturmer is explicitly recorded in the Domesday Book of 1086;

Archaeological Potential: the buried deposits of the moat, building platform, dam and ponds will contain nationally significant information on the medieval environment and economy of the manorial complex;

Rarity: The buried remains of the moated enclosure around a building platform, within a largely extant manorial landscape evident in both scheduled areas, is a nationally significant survival.

Group Value: the scheduled monument has considerable group value with the broadly contemporary C11 Church of St Mary (Listed at Grade I) which is part of the manorial complex.



Plate 8: Looking west towards the scheduled monument, the Grade I listed church is visible to the right

The setting of Sturmer Hall moated site and mill complex

The monument is intimately linked to Sturmer Hall, a former 15th century hall house that was extensively rebuilt in the late 20th century and is now in use as a hotel, and also to the adjacent church, an 11th century structure (Plate 8). These extant monuments form the principal structures of the former manorial complex at Sturmer and together provide a clear illustration of the layout of the medieval manor. There is supposition that the manorial complex was surrounded by an early medieval or medieval settlement, though no extant remains survive and no archaeological investigation has yet been undertaken to confirm this.



Plate 9: looking north east towards the scheduled monument across the site of the former farmyard

Historic maps from the 18th century onwards demonstrate that the manorial complex also formerly included a farmstead, which was located to the south west of the principal building. This was present until the mid-20th century. Modern developments have resulted in the loss of the historic farmyard (Plate 9), though one historic agricultural building appears to remain extant (Plate 10). This loss, along with modern planting and landscaping undertaken throughout the site, has resulted in quite a recent and significant alteration to the historic setting of the monument.

In place of the southern part of the former farmstead are a range of service buildings and an entertainment venue. While largely modern, the location of the buildings at least is partly reflective of the former ancillary buildings of the home farm. The northern buildings of the farmstead have also been removed, with a swimming pool and lawn now present in their place (Plate 11). Extensive landscaping has been undertaken to the west of the former farmyard, with a terraced service yard now present; this is surrounded by earthen bunds (Plate 12).

To the north west of the monument the former walled garden remains partially extant; portions of walling survive, though the western side of the garden has been removed and the remaining garden area infilled with modern buildings. To the north of the moat is a grassed and landscaped area that contains a mixture of coniferous trees and a small number of apple trees, presumably a remnant of the former orchard, in addition to modern garden features (Plate 13, 14). This is enclosed by a screen of coniferous trees that bound the scheduled monument to the north west and west, creating a sense of enclosure that would not have been part of the historic character of the site and largely blocking views towards the north and north west. Beyond the trees are two modern buildings, presumably related to the current function of the site.



Plate 10: The remaining historic agricultural building, looking north west



Plate 11: The site of former agricultural buildings to the north of the current service yard. The rear wall of the remaining historic farm building can be seen to the right.



Plate 12: Modern yard to the west of the former farmyard



Plate 13: Looking north from the moat towards the screen of conifers



Plate 14: Looking south towards the scheduled monument. The trees of the former orchard can be seen in the foreground. To the left is a modern building located within the former walled garden.



Plate 15: Looking across the western side of the moat and site of former agricultural buildings, showing the belt of coniferous trees in the background



Plate 16: The approach to Sturmer Hall, with the churchyard of St Mary the Virgin visible on the right



Plate 17: The wider landscape setting of the scheduled monument and church, as seen from the south east

In regards to the wider landscape setting the Sturmer Hall moated site and mill complex is situated within a shallow valley to the south west of Sturmer Village. The site is approached from the north east along Church Walk, a historic tree lined drive (Plate 16). The site is surrounded by farmland formerly under ownership of the estate, which forms a backdrop to views out of the scheduled area to the south due to the sloping sides of the valley (Plate 5). However, in other directions views are generally

quite limited due to the enclosed nature of the site, resulting from the topography, adjacent development (such as the church) and trees planted both within the scheduled monument and the wider proposal site. The site is secluded and peaceful due to the rural setting and distance between the monument and the principal transport route through the area, the A1017.

Contribution of the proposal site

The scheduled monument is located within the proposal site; however, the proposal site also extends beyond the boundary of the monument and therefore forms a part of its immediate setting. The proposal site therefore contributes to the significance of the scheduled monument directly, where the two intersect, and indirectly, where it forms a part of the setting of the monument.

4.2.2 Church of St Mary the Virgin

The Church of St Mary the Virgin, located immediately adjacent to the proposal site, is a Grade I listed building (List entry number 1122274). The building was first listed on 21st June 1962, with amendment on 16th May 1984; the full list entry is available on the Historic England website⁶, though a brief summary is as follows:

St. Mary the Virgin (formerly listed as GV Church of St Mary) I Parish church, early C11 and later. Flint and pebble rubble with dressings of limestone and clunch, porch of red brick, roofs of handmade red clay tiles. Nave early C11, chancel C12, W tower C14, S porch early C16, all well restored in C19.



Plate 18: The church of St Mary the Virgin, viewed from the south

⁶<https://historicengland.org.uk/listing/the-list/list-entry/1122274?section=official-list-entry>

The heritage significance of Church of St Mary the Virgin

The church has high, multifaceted architectural significance. The historic fabric of the church is a palimpsest, providing evidence of varying ecclesiastical architectural styles, often carried out to a high standard; in particular the unadorned and well-preserved character of the early work is identified as significant and remains clearly legible despite light restoration in the 19th century.

The church has significant historic value, having been at the heart of the manor from its inception in the 11th century; the building contains the memorials to former residents of the village and Sturmer Hall, testifying to the enduring importance of the building to the local community. The building also holds significant group value due to its close association to the adjacent Sturmer Hall scheduled monument and non-designated manor house.

The setting of Church of St Mary the Virgin

The setting of the church also contributes to its significance. The immediate setting of the building is defined by the churchyard boundary; this is defined to the north and west by the buildings, boundary walls and fences of Sturmer Hall (Plate 20, 21); to the east the churchyard borders farmland and is bounded by a hedgerow (Plate 19), while to the south Church Walk delineates the southern limit of the churchyard. Memorials located within the churchyard provide testament to the continued use of the building by the community. A line of mature trees and a slight depression clearly mark the location of the historic boundary, evident on historic maps of the site (Plate 19). This, along with trees growing within the churchyard, creates a sense of enclosure and limits views out towards the wider landscape. As is the case with the adjacent scheduled monument the churchyard is secluded and peaceful due to the rural setting and distance from the principal settlement and transport routes through the area.



Plate 19: Mature trees located along the historic eastern boundary of the churchyard



Plate 20: Looking west from within the churchyard towards the buildings of Sturmer Hall

The wider setting of the church is the manorial complex of Sturmer Hall, including the area of the proposal site; the buildings of Sturmer Hall and associated walls of the former walled garden form a notable visual element from within the churchyard due to their proximity, highlighting the interconnected nature of the two.



Plate 21: The eastern wall of the former walled garden, seen from the churchyard

The landscape setting of the church is similar to that of the scheduled monument. The church is located within a shallow valley to the south west of Sturmer Village and is approached from the north east along Church Walk, a historic tree lined drive (Plate 16). It is bordered by farmland, though this is better appreciated from the wider area or from Church Walk, as views out from the church are restricted due to the enclosed nature of the churchyard. The church tower can be seen from the surrounding countryside (Plate 17) between the surrounding trees.

Contribution of the proposal site

The proposal site has a strong historical and spatial association with the church, forming a part of the former manorial settlement; thus, the proposal site holds historic and archaeological value that contributes to the significance of the church. The proposal site also holds aesthetic value which contributes to the significance of the building, forming a part of its tranquil rural setting.

4.3 Non-designated Built Heritage

Sturmer Hall, the former 15th century hall house that occupies the moated site, was formerly a listed building. The building was de-listed following extensive renovations that resulted in the loss of the majority of its historic fabric.

The heritage significance of Sturmer Hall

Though now largely modern, the building is considered to be a non-designated heritage asset due to its remaining historic fabric and its historical association with the scheduled monument and adjacent church. The significance of the building is largely derived from its context and historical value, which relates to its association with the moated site upon which it is located and the adjacent church.



Plate 22: Sturmer Hall, viewed from the front lawn

The setting of Sturmer Hall

The building is intimately linked to the moated site and the adjacent church. Together these extant monuments form the principal structures of the former manorial complex at Sturmer and as such provide a clear illustration of the layout of the medieval manor. There is supposition that the manorial complex was also surrounded by a medieval settlement, though no archaeological investigation has been undertaken to confirm this.

Contribution of the proposal site

The proposal site forms a significant part of the building's immediate setting. As noted above, the proposal site contains monuments that have a strong historical association to the building.

5 THE PROPOSALS

The proposal site is situated across the Sturmer Hall estate, with buildings, landscaping and associated infrastructure proposed across the site. Sturmer Hall is currently in use as a hotel and conference venue and the layout of the site reflects this. The central building is associated with a series of modern ancillary buildings, including a conference venue, accommodation buildings and storage buildings. Modern landscaping can be seen across the site which includes flowerbeds, paved patio areas and a disused swimming pool.

As noted in section 1.4 the proposals comprise the construction of a new SEND school. The central school building would be located within the existing service yard, with associated buildings accommodated across the rest of the site. Most of the existing buildings within the proposal site would be retained and reused. The numbers below refer to those used on the proposal plan (Figure 11).

5.1 1: SEND School Building, D: Drop off zone

The principal school building is proposed within the bunded service yard to the west of the scheduled monument (Plate 23). The area is terraced into the landscape and surrounded by bunds that effectively screen the location from the wider landscape to the south, west and east (Plate 25, 26). However, as Plate 24 demonstrates, views towards the proposed site of the school building are possible from the driveway that leads from Church Walk into the proposal site; here the service yard, bund and treeline beyond form a backstop to views.

Historically this area of the site was part of a field known as *Brick Kiln Field*. The name is clearly indicative of the site of historic brick production, though no further evidence of the date or exact location of the kilns is known; the area is also close to the medieval manor, and historically it formed part of the wider agricultural landscape of the manor. As such the location falls within the wider setting of the scheduled monument and the listed building. The distance between the site and the monument is slightly greater than most of the proposed elements of the scheme, and on the whole the location is well screened from both adjacent scheduled monument and the listed building.



Plate 23: Looking west across the site of the proposed school building

The current character of the site cannot be said to meaningfully contribute to the significance of the scheduled monument or listed church, despite its location within the wider setting of both; the utilitarian and open character of the yard area detracts from the historic character of the manor and wider landscape.



Plate 24: Looking towards the proposed site of the school building from the driveway, adjacent to the scheduled monument



Plate 25: Looking towards the proposed site of the school from the mill pond



Plate 26: Looking towards the scheduled monument from the wider area, the bund of the service yard is visible to the right

There is some potential for archaeological remains to be present in this area. The historic field name suggests the potential for remains associated with brick production, and the site is also close to the medieval manor, to which a settlement is suggested to have been attached. However, there is likely to have been substantial truncation to the original ground level as a result of the terracing, substantially reducing the likelihood for the survival of archaeological remains in this area. If

remains do survive they would be located on the down slope side of the terrace, where the level of truncation is likely to be lower.

5.2 2: Hydrotherapy and Wellness

The hydrotherapy and wellness building is proposed in the location of the existing conference venue. The venue forms one of the cluster of largely modern buildings located in the area of the historic farm yard. The existing building comprises a traditional timber clad gabled agricultural-style building, with an appended semi-permanent tented structure.

The current proposals are for the retention of a building in this location, with some additional hard landscaping proposed around the building. The building sits within the immediate setting of the mill pond, and features quite prominently in key views across the mill pond from the wider area (Plate 29); it also features in views towards the mill pond from the scheduled area in front of the hall (Plate 28).

The traditional building (Plate 27), which fronts the small yard area to the west of the scheduled monument, is modest in scale and broadly sympathetic to the location because it is reminiscent of the agricultural vernacular. The tented structure is less sympathetic to the location however, and though it is screened to a certain extent due to a number of mature trees situated around the northern side of the mill pond, it does feature in some views (Plate 29).



Plate 27: The more traditional building that forms the northern part of the venue building



Plate 28: The events venue as viewed from within the northern part of the scheduled monument



Plate 29: The events venue viewed from the public footpath to the south of the proposal site

The building in its current form cannot be said to contribute to or enhance the setting of the scheduled monument; the temporary appearance and modern design of the building detracts from the historic character of the monument's setting. The building is also located within the wider setting of the adjacent church, though it is largely screened from the building. Similarly, the building in its current form cannot be said to contribute positively towards the setting of the listed building.

Located adjacent to the mill pond within the core of the medieval manor the potential for archaeological remains to be present in this area is also likely to be high. In particular there is the potential for remains associated with the medieval mill pond and former agricultural buildings known to have been present here. Construction of the existing buildings is likely to have resulted in some impact to any underlying remains; similarly, the area has been occupied by buildings, and presumably yard surfaces, throughout the post-medieval period as part of the farm yard.

Any ground reduction associated with the proposals has the potential to encounter buried archaeological remains.

5.3 3: Admin and Management Centre

Sturmer Hall is proposed for the admin and management centre. The proposals are not anticipated to require any significant alteration to the existing building and thus are not discussed further here.

5.4 4: Educational Support Spaces, P: Parking (secondary)

A number of ancillary educational support buildings are proposed within the grounds of Sturmer Hall. These would be accessed by vehicle along the existing access road and on foot by a series of linked footpaths. Associated parking spaces would also be established. The buildings are primarily proposed to the west and north west of the northern section of the scheduled monument.



Plate 30: The proposed location of three educational support buildings

Four of the buildings are proposed to the west of the band of trees that bound the northern part of the scheduled monument (Plate 30). This area falls outside the historic core of the site, though within the wider setting of the monument. The proposed buildings are situated within an area that was described as an orchard in the

early 19th century and later reorganised to form a larger field. The area now forms part of a larger area of meadow that is separated from the core of the site by the band of trees. In comparison with the area of the moat this area is open, with wider views towards the northern boundary of the site. Two modern buildings are present in this area, neither of which have any heritage value. Due to this extensive reorganisation the historic character of the site is not particularly legible; this is exacerbated by the band of trees which visually annexes the area from the moat, despite it being nearby (Plate 31). Thus the area currently provides a negligible contribution to the significance of the scheduled monument as part of its wider setting.

The site falls within the wider setting of the listed church, though there is minimal inter-visibility between the two sites. As such the site provides a minor contribution as a small part of the wider manorial site.

The potential for archaeological remains associated with the medieval manor is perhaps lower in this area, as it appears to have been located outside of focal point. However, there may be the potential for remains associated with the conjectured medieval settlement, the location (or existence) of which is uncertain. The location of the cabins does not appear to have been subject to any significant truncation or ground disturbance, beyond the construction of the two modern buildings and road, therefore the potential for the survival of remains is likely to be good.



Plate 31: Looking west across the moat towards the location of the proposed buildings

Three further buildings are proposed in the north east corner of the site (Plate 32). This area falls outside the historic boundary of the manor, though it is now located within the boundary of the site due to modern boundary reorganisation. The site sits beyond a belt of trees that marks the site of the historic boundary, to the west of the modern eastern boundary of the site. The site therefore falls within the wider rural setting of the scheduled monument, but did not historically form a component of the

manorial complex. Similarly, the site is situated within the wider environs of the church, but does not form a key component of its setting.

The location is well screened from both monuments due to intervening vegetation, tree cover and development.



Plate 32: Looking towards the site of the proposed buildings

5.5 5: Bungalow (Educational Supported Living), M: Main parking zone

The existing garden accommodation building is proposed for the supported living bungalow. The building is modern, with no heritage value; the proposals are not anticipated to require any significant alteration to the existing building.

The area is located within the wider setting of the scheduled monument, adjacent to (parking) and within (bungalow) the historic walled garden associated with the manor. The site provides a minor contribution to the setting of the monument as a small part of the wider manorial site; the extant walls of the walled garden increase the historic legibility of the site and emphasise its relation to the wider manor.

The site falls within the wider setting of the listed church, though there is minimal inter-visibility between the two sites. As such the site provides a minor contribution as a small part of the wider manorial site.

The proposed main parking zone would necessitate the extension of the existing parking area in this location. The parking area is situated behind the accommodation building and as such is largely screened from the site of the scheduled monument (Plate 33), though further extension may result in a slight erosion of the existing rural character of this part of the site.



Plate 33: Existing parking area and accommodation building

5.6 6: *Barn Conversion to Specialist Care Living*

The existing building, located in the current service yard, is proposed for conversion. The building is a modern agricultural barn with no heritage value (Plate 9); the proposals are not anticipated to require any significant alteration to the external appearance of the existing building. The building in its current form cannot be said to contribute to or enhance the setting of the scheduled monument.

The building is also located within the wider setting of the adjacent church, though it is largely screened from the building. Similarly, the building in its current form cannot be said to contribute positively towards the setting of the listed building.

Located close to the moated site the potential for archaeological remains to be present in this area is likely to be high; there is also the potential for remains associated with the former agricultural buildings known to have been present here. However, construction of the existing building is likely to have resulted in impact to any underlying remains; similarly, the area has been occupied by buildings, and presumably yard surfaces, throughout the post-medieval period as part of the farm yard.

5.7 7: *Site Warden Office and Accommodation*

An existing ancillary building located adjacent to Sturmer Hall is proposed for the location of the site warden's office and accommodation. The proposals are not anticipated to require any significant alteration to the existing building and thus are not discussed further here.

5.8 *M: Main Parking Zone*

An area of parking is also proposed to the west of the moat (Plate 34). This area has been terraced and is currently occupied by a disused swimming pool with associated walling and patio area. This area of the site, an orchard in the early 19th century, became part of the farmyard when it was extended in the late 19th century; the site of the proposed buildings was occupied by a U-shaped range of agricultural buildings.



Plate 34: Looking north west towards the location of the proposed car park, with the moat visible on the right of frame

The site of the proposed buildings is located within the immediate setting of the scheduled monument (Plate 31); due to this close association the area provides a contribution to the current setting, though the modern swimming pool and landscaping detract slightly. Visually, any development here will be seen in close association with the monument and as such the site is highly sensitive to change. While there is evidently historic precedent for development here, within close proximity to the scheduled site, the form of any proposals require careful consideration in order to minimise harm to the setting of the monument.

The site falls within the wider setting of the listed church, though there is minimal inter-visibility between the two sites. As such the site provides a minor contribution as a small part of the wider manorial site.

Located adjacent to the moat, within the core of the medieval manor, the potential for archaeological remains to be present in this area is likely to be high. In particular there is the potential for remains contemporary with the medieval moated site, though also for remains associated with the historic farm buildings. Later development of the swimming pool is likely to have resulted in some truncation, however the footprint of the pool is relatively small.

6 DISCUSSION

6.1 *Designated Heritage*

6.1.1 *The Impact of the Proposal on Scheduled Monuments*

The proposal site encompasses a single Scheduled Monument, the *Sturmer Hall Moated Site and Mill Complex*. The heritage significance of the scheduled monument is largely derived from its archaeological interest, which relates to the extant form of the monument and the potential for archaeologically significant buried remains to be present within the scheduled area. However, the setting of the monument also contributes to its significance. The most pertinent elements of the monument's setting are its relationship to the broadly contemporary Grade I listed Church of St Mary the Virgin and the formerly Grade II listed Sturmer Hall. Together these sites form a significant and largely extant manorial centre, first referenced in the 10th century. The wider landscape setting of the monument also contributes to its overall significance, however this is unlikely to be affected by the proposals.

Any development within the proposal site will be within the setting of the scheduled monument, though to varying degrees; the potential for indirect impact to the monument arising from the alteration to the setting of the scheduled monument must therefore be considered.

The most substantial element of the proposals is the construction of a new school building to the south west of the scheduled monument. Historically the proposed site of the school was a field, located just beyond the farm yard of the manor. The gradual expansion of the farm yard means that the area is now a service yard, landscaped and screened from the wider landscape by large bunds. As a result the historic character of the site has been lost and in its current form the site contributes little to the significance of the scheduled monument. Due to the loss of any historic character, the site's distance from the manorial core and the existing screening provided by the bunds, it is considered to be the case that this location could accommodate a new building while also avoiding harm to the setting of the scheduled monument. As the principal school building, the structure will inevitably be a focal point within the proposal site; however, to sustain and enhance the heritage significance of the manorial complex the existing moated site and building of Sturmer Hall should remain the focal point. To aid in this the proposed structure has been designed in order to minimise visibility within the wider landscape, while also providing an attractive and architecturally distinctive building. The modern design represents a divergence from the historic character of the wider site; however, this part of the site is currently an unsightly area of hardstanding that detracts from the wider setting of the manorial complex. The location and low profile of the building should therefore help to mitigate the potential for harm to some extent.

Another significant element of the proposals is the hydrotherapy building, situated in the location of the existing conference venue. This building sits within the immediate setting of the mill pond, and features prominently both in key views across the mill pond from the wider area and in views towards the mill pond from the scheduled area in front of the hall. The existing ad-hoc collection of buildings detract from the setting of the monument and as such there is an opportunity for enhancement through

sensitive redevelopment. The proposed structure occupies a similar footprint to the existing buildings, and its proportions are similar; elements of the design reflect the existing farm/ancillary buildings on the site, however the overall form is more contemporary. On the whole it is a considered design that represents a clear improvement over the existing structures which are an ad-hoc collection of poor quality buildings.

In addition to the main school building a number of educational support buildings are proposed; these are broadly arrayed in an arc around the scheduled monument, following the route of the existing access track. Section 5 above interrogates the proposed locations of these in more detail; the buildings are located within the wider setting of the monument, in areas that historically formed orchards or fields. Development would result in a slight change to the wider setting of the monument, introducing built elements into an area that has historically been open; however, these areas are more peripheral to the monument, and not clearly experienced from the area of the moat. The change would be more perceptible as a result of perambulation across the site and from the wider landscape, however. To mitigate harm the proposed buildings are modest in scale, with a material palette that is reflective of historic agricultural buildings.

An area of parking is proposed to the west of the moated site. While the setting of the moat here has been subject to modern alteration it is more sensitive to further change due to the proximity of the extant moat and adjacent Sturmer Hall. The surfacing and access road associated with the car park will alter the existing character of the area, though appropriate surfacing would help to reduce the extent to which this causes harm to the setting of the monument. The regular presence of vehicles in this area will also result in further change to the setting of the monument.

The cumulative effect of the proposed development is likely to result in a certain degree of harm, despite the high quality design of the proposals. In addition to the more specific changes arising from the placement and design of the buildings, the proposed change in use will also result in wider changes to the site as a whole. Most notable will be an increase in pedestrian and vehicle movements across the site, with a corresponding increase in noise levels. An increase in artificial lighting, especially during winter months, is also to be anticipated. In its current form the proposal site is peaceful, reflecting its relatively isolated location; this is a function of its historic development and its status as the centre of the manor. While some of these changes are unavoidable, others, such as lighting, can be mitigated against through careful design to reduce harm.

In addition to the visual alterations to the setting, there is the potential for impact to buried remains contemporary with the scheduled monument. The proposals have been designed in order to avoid any direct below-ground impact to the scheduled monument. Therefore, the risk of harm arises only from indirect impact to archaeological remains located within the setting of the monument. Any impact to archaeological remains within its setting would potentially result in harm to the overall significance of the monument. However, the level of harm would be proportionate with the significance of the remains identified, and with the level of impact to these.

On the whole the level of harm caused to the *Sturmer Hall Moated Site and Mill Complex* Scheduled Monument as a result of the proposals is predicted to be Less than substantial.

While the proposed change in use evidently presents challenges from a heritage perspective the opportunity for enhancement should also be considered. Sensitive redevelopment of the existing poolside building has the potential to enhance the setting of the scheduled monument through removal of the existing ad-hoc structures in this location. Development of the site may also represent an opportunity to develop a management plan to ensure the ongoing preservation of the monument. The development may also represent an opportunity to increase wider public knowledge of the monument; while the significance of a monument is not commensurate with its level of public accessibility, a greater public understanding and knowledge of the monument would be a clear benefit.

Targeted archaeological investigation across the site is also likely to result in a greater understanding of the manorial site, and any associated settlement. The results of any such investigation will contribute towards our understanding of the site and potentially help to guide its future use.

6.1.2 The Impact of the Proposal on Listed Buildings

A single listed building has been identified as being at risk of harm as a result of the proposals. This is the Grade I listed Church of St Mary the Virgin, located adjacent to the proposal site; as a Grade I listed building it is of exceptional interest. There would be no physical impact to the building as a result of the proposals; however, the proposal site is located within the setting of the church.

The proposal site arguably forms the most significant part of the historic setting of the church, and as such provides a notable and positive contribution to its overall significance. In particular this contribution comes from the extant moat, mill pond and building of Sturmer Hall, which when taken together form the clearly legible manorial complex.

Visually the majority of the proposals are likely to be imperceptible from the church (or in views of the church) due to intervening development, vegetation and distance. Elements of the proposals that may feature include the main school building and hydrotherapy building, which may be partially visible in views towards the church and Sturmer Hall from Church Walk. However, because the proposed site of both buildings are located at a distance from the church these views are unlikely to result in any significant change to the current setting. However a degree of change will be perceptible as a result of the cumulative changes within the proposal site. As such the proposals are predicted to result in a negligible degree of harm to the listed building.

6.2 Non-designated Heritage Assets

6.2.1 The Archaeological Potential and Significance of the Proposal Site

Based on the available evidence the proposal site is situated within an area of significant archaeological potential. Table 1 identifies the known or potential

archaeological sites and monuments located within the proposal site and provides an outline of their significance. Significance has been assessed using guidance *Statements of Heritage Significance* (2019), *The Setting of Heritage Assets* (2017), *Standard and Guidance for Historic Environment Desk-based Assessment* (CIFA 2020) and *Annex 1: Principles for the Selection of Ancient Monuments in Scheduled Monuments & nationally important but non-scheduled monuments* (DCMS 2013). Levels of significance have been assigned in relation to guidance produced by CIFA, which notes that significance should be judged in a local, regional, national or international context as appropriate.

Table 1. Known or potential heritage assets within the proposal site and their significance

Period/Site	Potential	Significance	Reasoning
Early Prehistoric	Low	N/A	There is no evidence for early prehistoric activity within the proposal site or wider search area.
Late Prehistoric	Moderate	Moderate to High significance (Regional)	<p>Although there is no substantial evidence for later Neolithic and Bronze Age for activity within the proposal site, the immediate environs indicate cropmark evidence and the extant remains of a Bronze Age round barrow. The presence of these sites is clearly indicative of activity spread across the local landscape. The Iron Age coin found within the proposal site is further evidence of landscape-wide activity during the period, however the limited nature of the find precludes any further analysis.</p> <p>Based on the above, the potential for archaeological remains dating to this period is therefore considered to be moderate. Any archaeological remains present will have high archaeological interest, potentially holding evidence likely relating to a range of human activity. Any remains would have associative value with the surrounding prehistoric landscape.</p>
Roman	Low to Moderate	Moderate (Local to Regional)	<p>Although there is no evidence of Roman activity within the proposal site, a large quantity of material located to the south east, is indicative of the presence of a substantial settlement. Occasional finds also extend throughout the landscape, while the route of a Roman road is also known nearby.</p> <p>Any archaeological remains present will have high archaeological interest, potentially holding evidence likely relating to a range of activity. These would have associative value and would increase our knowledge of the wider Roman landscape.</p>
Early medieval	High	Moderate to High (Local to Regional)	The proposal site is located across the Sturmer Hall early medieval/medieval manorial complex, which survives as a partially extant moated site and adjacent mill pond. The

Period/Site	Potential	Significance	Reasoning
			<p>manorial complex may also have been associated with a settlement, however no archaeological investigation has been undertaken to ascertain the potential location of such a settlement As such the potential for archaeological remains dating to this period is considered to be moderate to high.</p> <p>Any archaeological remains present will have high archaeological interest, potentially relating to the development and layout of the early medieval settlement. These remains would therefore have the potential to increase our understanding of the settlement, its economy and its occupants and would have associative value with the extant monuments and adjacent church.</p>
Medieval	Low to Moderate	Moderate to High (Local)	<p>The proposal site is located across the Sturmer Hall early medieval/medieval manorial complex which survives as a partially extant moated site and adjacent mill pond. As such the potential for archaeological remains dating to this period is considered to be moderate to high.</p> <p>Any archaeological remains present will have high archaeological interest, potentially relating to the development and layout of the early medieval settlement. These remains would therefore have the potential to increase our understanding of the settlement, its economy and its occupants,</p>
Post-medieval	High	Low to Moderate (Local)	<p>Sturmer Hall remained in use into the post-medieval period. Historic maps provide clear evidence for the presence of multiple phases of ancillary buildings from the late 18th century onwards, concentrated to the south west of the manor, presumably the site of a 'home farm' and thus likely to represent a range of buildings associated with the agricultural management of the estate.</p> <p>Any archaeological remains present will have high archaeological interest, relating to the 'home farm'.</p>

6.2.2 The Impact of Previous Development on Potential Archaeological Remains

The current and historic land use of the proposal site must be considered in relation to the known and potential heritage assets within, and any impacts arising as a result because intensive use of the proposal site may have resulted in harm to any underlying remains, thus reducing their potential archaeological value. Conversely, if the proposal site has not been subject to a high level of development archaeological remains are likely to survive well.

The proposal site has been subject to a moderate level of previous development. The two areas of the site that have been subject to the highest levels of redevelopment are the area of the proposed school building and the area of the former farm yard. These sites have undergone extensive landscaping and (in the case of the farm yard area) multiple phases of development that are likely to have had a material impact upon any underlying archaeological remains. However, the full extent of this impact remains uncertain without further archaeological investigation.

Elsewhere the level of previous development is lower, with the majority of the proposed buildings located within areas of former orchard or field. Here the conditions for the potential survival of archaeological remains are more amenable.

6.2.3 The Impact of the Proposal on Archaeological Remains

Based on the results of this study the proposal site has the potential to contain archaeological remains of local to regional interest, dating from the late prehistoric period onwards. No archaeological investigation has been undertaken within the proposal site, however archaeological remains are known to be present within the proposal site and there is also good potential for the survival of remains in a number of places.

Any excavation undertaken has the potential to cause harm to underlying archaeological remains, resulting in partial or complete loss of the archaeological resource in the impacted area. In particular, the following groundworks have the potential to impact upon any known and as yet unknown archaeological remains within the site:

- Excavation of foundation trenches for the proposed buildings;
- Excavation of trenches for services, soakaways etc. associated with the buildings;
- Landscaping across, including the creation of new vehicular routes and pedestrian paths

Therefore, due to the archaeological potential of the proposal site, and the potential for the proposed development to cause harm to any underlying remains, it is likely that further archaeological investigation of the site will be necessary. This would allow the full nature and significance of any archaeological remains present within the proposal site to be fully assessed, in line with the NPPF and local planning policy.

Appropriate investigation may comprise an archaeological trial trench evaluation. However, the nature of this investigation should be determined by the archaeological advisors to Braintree Council.

6.2.4 The Impact of the Proposal on Non-Designated Built Heritage Assets

Sturmer Hall

The significance of the current building of Sturmer Hall largely arises from its setting and historic association with the moated site and adjacent church, as the building itself

has limited historic interest. The proposals will not result in any changes to the structure itself; any impact will therefore arise as a result of change to the setting of the building.

The proposals will result in an alteration to the existing character of the site; this alteration will be cumulative and largely derived from the number of small changes or developments across the site. While most will be screened from the building the change in character of the wider setting will be perceptible, thus resulting in slight harm to its setting.

7 BIBLIOGRAPHY

7.1 Archives Consulted

Essex Archives: <https://www.essexarchivesonline.co.uk/>

National Heritage List for England: <https://historicengland.org.uk/listing/the-list/>

7.2 Cartographic Material

John Chapman and Peter Andre's map of Essex, 1785

Ordnance Surveyor's Drawing of Boxstead dated to 1799

ERO: SALE/B2350 Sales Catalogue plan of 1819

ERO: D/CT 340B Sturmer tithe map of 1841

1st Edition Ordnance Survey 25" County Series map of 1878

1921 Edition, Ordnance Survey 25" map

7.3 Legislation, Policy Documents and Local Plans

Ancient Monuments and Archaeological Areas Act 1979

Planning (Listed Buildings and Conservation Areas) Act 1990

Planning Practice Guidance, Historic environment: Advises on enhancing and conserving the historic environment 2014 (Revised 2019), available at: <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

Town and Country Planning Act 1990

The National Planning Policy Framework 2024, available at: <https://www.gov.uk/guidance/national-planning-policy-framework>

7.4 Printed Primary and Secondary Sources

CIfA. 2020a. *Standard and guidance for Archaeological Desk-based Assessment*. Reading: Chartered Institute for Archaeologists.

CIfA. 2021. *Code of conduct: professional ethics in archaeology*. Reading: The Chartered Institute for Archaeologists.

Historic England. 2015. *Managing Significance in Decision-Taking in the Historic Environment*. Swindon: Historic England.

Historic England. 2017. *The Setting of Heritage Assets*. Swindon: Historic England.

Historic England. 2019. *Statements of Heritage Significance: Analysing Significance in Heritage Assets*. Swindon: Historic England.

7.5 Gazetteer of Sites

ID	Period	Identifying Number	X coordinate	Y coordinate	Description
1	Bronze Age	NHLE 1008189, MEX 5708	568837	244286	An extant Late Neolithic to Bronze Age bowl barrow located c. 300m north of the proposal site
2	Bronze Age	MEX28514	569300	243900	The cropmark of a further probable barrow, located c.290m north east of the proposal site
3	Bronze Age	Google Earth 2018	567852	243786	The cropmark of a further probable barrow, located 850m west of the proposal site
4	Iron Age	CCI-953535	568971	243897	An Iron Age silver coin found in the area of Sturmer Hall in the late 20th century
5	Iron Age	PAS multiple references	569870	243024	A scatter of 12 metal objects found over an area of c.11 hectares, 1 to 1.4km south east of the proposal site
6	Prehistoric	MEX1051950	568920	244230	The cropmark of an enclosure of probable late Prehistoric date visible approximately 180m north of the proposal site
7	Prehistoric	MEX1051951	569390	243410	The cropmarks of a possible late Prehistoric enclosure visible approximately 550m south east of the proposal site
8	Prehistoric	MEX1052014	569440	244310	The cropmarks of a possible Neolithic henge monument located c. 550m north east of the proposal site
9	Prehistoric	MEX5879	569400	244500	Two possible ring ditches, visible as low earthworks in the late 20th century
10	Roman	MEX1051575	569420	244067	The former route of the Roman road from Godmanchester to Colchester
11	Roman	MEX1039454, PAS multiple references	569850	243010	An extensive scatter of c. 1000 objects found over an area of c.11 hectares, 1 to 1.4km south east of the proposal site
12	Roman	SF-58DC61	569253	243046	One of two 3rd century copper alloy coins
13	Roman	SF-A207F0	569000	242960	One of two 3rd century copper alloy coins
14	Roman	SF-593265	567984	243926	A fragment of a copper-alloy coin found c. 700m west of the proposal site
15	Roman	SF-596478	569982	243822	A copper-alloy coin found c. 900m east of the proposal site
16	Roman	MEX42121	567720	244230	A fieldwalking survey identified concentrations of Roman pottery
17	Medieval	List Entry Number:	568988	243877	Sturmer Hall moated site and millpond, a Scheduled Monument

		1012094			
18	Medieval	List Entry Number: 1122274, MEX5791	569022	243899	The Church of St Mary the Virgin, a Grade I Listed Building
19	Medieval	MEX5778	568900	243800	Sturmer Hall, a former 15th century hall house largely rebuilt in the 20th century
20	Medieval	MEX5800	568900	243900	The conjectured site of the medieval settlement associated with Sturmer manor
21	Medieval	MEX1051946	569570	243380	The cropmarks of a medieval or post-medieval farmstead
22	Post-medieval	MEX1004987	569860	244030	Challices Farmhouse, an early 17th century lobby entry house
23	Post-medieval	MEX1004985	569800	243870	Suffolk Edge, a 17th century timber framed house
24	Post-medieval	MEX1004980	569470	244070	The Red Lion Public House
25	Post-medieval	MEX1004975	569300	244570	A 16th century barn, at Pope Mill farm
26	Post-medieval	MEX1004977	569720	244520	2 Kedington End, a 17th century timber-framed house
27	Post-medieval	MEX1004981	569750	243960	Station Corner Cottage, a mid - 19th century pair of cottages
28	Post-medieval	MEX1004986	569880	243810	Abbots Hall, an early 19th century house
29	Post-medieval	List entry number 1470460	569297	244096	A late 18th century milestone and an early 19th century milepost
30	Post-medieval	SALE/B2350	568944	243821	A courtyard of buildings visible on the 1829 sales catalogue map
31	Post-medieval	SALE/B2350	568917	243877	A rectangular building visible on the 1829 sales catalogue map
32	Post-medieval	Google Earth 2018, Historic England 26832/032	568630	244036	Post-medieval field boundaries, visible as cropmarks and on the 1841 tithe map
33	Post-medieval	Google Earth 2018	568678	243458	Post-medieval field boundaries, visible as cropmarks and on the 1841 tithe map
34	Post-medieval	Google Earth 2018	568000	243852	Post-medieval field boundaries, visible as cropmarks and on the 1841 tithe map
35	Post-medieval	EA LiDAR	568844	243874	A post-medieval field boundary, visible as a slight earthwork
36	Post-medieval	MEX1051952	569390	243410	Post-medieval field boundaries, visible as cropmarks

37	Post-medieval	MEX22439	568858	243634	The route of the former Colne Valley Railway
38	Post-medieval	MEX1051938	569820	243970	The route of the former Cambridge, Haverhill and Melford Branch of the Great Eastern Railway
39	Post-medieval	MEX1050	569520	244020	The foundations of an early 19th century building
40	Undated	MEX1051948	569920	243960	Undated cropmarks of ditches and pits identified to the west of Challice's Farm,
41	Undated	EA LiDAR	569090	243842	Low U-shaped linear earthworks, visible on LiDAR data
42	Undated	EA LiDAR	569237	243854	A small pond or former dam, located to the south east of the proposal site

7.6 *Aerial Photographs*

Historic England Archive: Aerial Photo Viewer

<https://historicengland.org.uk/images-books/archive/collections/aerial-photos/> (Accessed 4/09/2025)

Historic England Aerial Archaeology Mapping Explorer

<https://rb.gy/kwhdki> (Accessed 4/09/2025)

Additional Sources

Bing Maps: satellite imagery

Britain From Above: <https://www.britainfromabove.org.uk> (Accessed 4/09/2025)

Cambridge Aerial Photo Archive: <https://www.cambridgeairphotos.com> (Accessed 4/09/2025)

Google Earth (GE): satellite imagery (Accessed 4/09/2025)

Ordnance Survey: satellite imagery

Picture Oxon: <https://pictureoxon.com> (Accessed 4/09/2025)

7.7 *Environment Agency LIDAR*

LIDAR Composite DTM 2022, 1m resolution: TL64ne, TL64se, TL74nw, TL74sw; Visualisations: Hillshade: 16 directions; 35° elevation

8 APPENDIX: LEGISLATION, GRADING ASSETS & LEVELS OF IMPACT

8.1 Primary Legislation

The relevant primary legislative framework for the historic environment is contained in the following acts:

- “*The Hedgerow Regulations*” of 1997, section 97 of the “Environment Act” of 1995 gives protection to hedgerows determined to be of historic importance.
- *Town and Country Planning Act* 1990 – sets out the planning framework.
- *Planning (Listed Buildings and Conservation Areas) Act* 1990 – specific protection for buildings and areas of special architectural or historic interest.
- *Ancient Monuments and Archaeological Areas Act* 1979 – specific protection for monuments of national interest.
- *Historic Buildings and Ancient Monuments Act* 1953 – provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

8.2 Grading Heritage Assets and Levels of Impact

As laid out in the NPPF, described above, and in Paragraph 018 of PPG 2014 (Revised 2019) ‘*what matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting.*’ The NPPF (Annex 2) defines significance as ‘*the value of a heritage asset to this and future generations because of its heritage interest*’ and it may derive ‘*not only from heritage asset’s physical presence, but also from its setting*’. Significance is what conservation sustains, and where appropriate enhances, in managing change to heritage assets.

Therefore, the assessment of the impact of a proposed development, or change to a heritage asset, either designated or non-designated, depends on considering the significance of the asset and any perceived harm that could happen to it and/or its setting (Historic England 2015). The potential harm and impacts are to be avoided, minimised, and mitigated, taking opportunities to better reveal or enhance significance, thereby ensuring any unavoidable harmful impacts are justifiable by public benefits, that can be deemed as necessary and otherwise undeliverable (Historic England 2015; Historic England 2019).

HE’s guidance document *Statements of Heritage Significance* (2019) states that an understanding of significance must stem from the interest(s) of the *heritage asset*, whether *archaeological, architectural, artistic, or historic*, or a combination of these. These must:

- Describe significance following appropriate analysis, no matter what the level of significance or the scope of the proposal.

- Be sufficient for an understanding of the impact of the proposal on the significance, both positive and negative.
- Be sufficient for the Local Planning Authority (LPA) to come to judgement about the level of impact on that significance and therefore on the merits of the proposal.

Further guidance is to be found in HE's The Setting of Heritage Assets (2017) which affirms that statements of significance need to consider:

- How the historic character of a place makes it distinctive. This may include its association with people, now and through time; its visual aspects; the features, materials and spaces associated with its history including its original configuration and subsequent losses and changes.
- Contextual relationships between the asset and any other heritage assets that are relevant to the significance including the relationship of one asset to another, same architects, or associative relationships.
- Communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

Table 2. Criteria for assessing the significance of a heritage asset

Significance	Definition	Relevant Heritage Assets
Very High (International)	Relatively complete and predominantly static landscapes sensitive to change. Internationally significant locations or sites.	World Heritage Sites. Historic landscapes of national or international importance, whether designated or not. Extremely well-preserved historic landscapes with exceptional coherence, time-depth, or other critical factors.
High (National)	Locations or Buildings that have little ability to absorb change without fundamentally altering its present significant character. Well preserved historic landscapes, exhibiting considerable coherence, time depth and other factors. Sites associated with historic nationally and internationally important people or groups.	Scheduled Monuments: Archaeological sites of schedulable quality and significance. Listed Buildings (Grades I, II*). Registered Historic Parks and Gardens (all grades). Historic Battlefields.
Medium (Regional)	Locations and Buildings that have a moderate capacity to absorb change without significantly altering their present character, has some environmental value, or is of regional or high local importance.	Local Authority designated sites (e.g.: Conservation Areas and their settings). Listed Buildings (Grade II). Undesignated sites of demonstrable regional importance. Averagely well-preserved historic landscapes with reasonable coherence, time-depth, or

		another critical factor.
Low (Local)	Locations and Buildings tolerant of change without detriment to its character, is of low environmental value, or is of moderate or minor local importance.	Sites with significance to local interest groups. Sites of which the significance is limited by poor preservation and poor survival of contextual associations.
Negligible	No loss	No loss

Proposed developments and changes to heritage assets and their setting can be described as positive, negative, or neutral (Table 4). Definitions of terms used to describe the impact of damage on a heritage assets significance, and how this can be assessed, is contained in the NPPF and PPG. From these sources a list of clearly defined criteria regarding the physical and visual impact of a proposal on the site, building and its setting can be made. These define the degree of harm that can potentially be caused to a heritage asset and facilitates balancing the potential harm identified against the benefits of the proposal.

Table 3. Criteria for the assessment of the degree of harm to the significance of an asset

Degree of Harm	Definition
Total Loss	Total removal of the significance of a heritage asset.
Substantial	Serious harm that would remove or vitiate the significance of a heritage asset. Change to a heritage asset's setting, such that the significance of the asset would be totally lost or substantially reduced (e.g.: the significance of a designated heritage asset would be reduced to such a degree that its designation would be questionable; the significance of an undesignated heritage asset would be reduced to such a degree that its categorisation as a heritage asset would be questionable).
Less than substantial – High	High level of harm that could be serious, but not so serious as to vitiate or change the significance of a heritage asset. Partial physical loss of a heritage asset, or its setting, or both, such that the asset's significance would be materially affected/considerably devalued, but not totally or substantially lost.
Less than substantial – Moderate to Minor	Slight loss of the significance of a heritage asset. This could include the removal of fabric that forms part of the heritage asset, but that is not integral to its significance. Some harm to the heritage asset's setting, but not to the degree that would result in a meaningful devaluation of its significance. Perceivable level of harm, that is enough to be noticeable or material, but insubstantial relative to the overall interest of the heritage asset.
Negligible	A very slight change to a heritage asset which does not result in any overall harm to its significance. Very minor change to a heritage asset's setting such that there is a slight impact, but not materially affecting the heritage asset's significance.

No Impact	No effect to the heritage asset or its setting.

Table 4. Criteria for assessing the impact of change to a heritage asset

Impact	Definition
Positive	<p>Proposed changes represent a positive strategy for the conservation and enjoyment of the heritage asset and positive contribution to the character of the building.</p> <p>Such changes may:</p> <ul style="list-style-type: none"> • restore the building to the original structure or fabric • sustains, enhances, or better reveals the significance of the heritage asset • positive contribution to the local character and distinctiveness
Neutral	<p>Proposed changes represent a neutral strategy for the conservation and enjoyment of the heritage asset and neutral contribution to the character of the building.</p> <ul style="list-style-type: none"> • very minor change to a heritage asset's setting such that there is a slight impact
Negative	<p>Proposed changes represent a negative strategy for the conservation and enjoyment of the heritage asset and negative contribution to the character of the building.</p> <p>Such changes may:</p> <ul style="list-style-type: none"> • lose or remove original features of the building • causes the asset's significance to be materially affected/considerably devalued • negative contribution to the local character and distinctiveness