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Our ref: P01607809

15 May 2026

Dear Mr Lockwood

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

**STURMER HALL, CHURCH WALK, ESSEX CB9 7XD
Application No. 26/00731/OUT**

Thank you for your letter of 28th April 2026 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Summary

The proposals would create unmanaged and unjustified harm to a Scheduled Monument and grade I listed building. Historic England do not support the current scheme, including in consideration of an application for the necessary parallel Scheduled Monument Consent that is under our remit. We would be happy to discuss alternative proposals.

Historic England Advice

Significance

The Scheduled Monument within the application site ("Sturmer Hall moated site and mill complex" NHLE no. 1012094) comprises two discrete areas; the mediaeval moat now occupied by the fifteenth century Sturmer Hall (formerly a listed building), and the contemporary mill site to its south. Buried deposits of the moat, building platform, dam and ponds will contain nationally significant information on the mediaeval environment and economy of the manorial complex reaching as far back as the tenth century. These remains and the visible elements of the monument, evident in both scheduled areas and appreciable within a largely extant manorial landscape, are a nationally significant survival.



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Immediately east of the application boundary is the grade I listed Parish Church of St Mary the Virgin, with its earliest surviving fabric dated to the eleventh century. Roman tiles are recorded as having been found close to the church and Rowley Hill follows the line of the Roman road from Godmanchester to Colchester. The scheduled monument has considerable group value with the broadly contemporary church, which is part of the manorial complex.

The Sturmer Hall-St Mary's Church complex represents the core of a mediaeval manorial holding, one that retains its compact and legible rural setting. This is in contrast to nearby Haverhill and Sturmer which have similar, likely pre-Conquest, roots but which developed much more widely and with greater density in the modern era.

The site stands on the chalk valley sides of two tributaries of the Stour with one stream having been exploited for a water mill at the site since at least the time of Domesday Book. Mediaeval field systems are archaeologically recorded in the immediate surrounds of the site while nearby Greatley Wood and Bex Grove are Ancient Woodland and add further to the time depth of historic landscape significance and the human exploitation of it here

A scheduled prehistoric barrow ("Bowl barrow 500m north-west of Sturmer Hall" NHLE no. 1008189) stands 300m north of the pre-app consultation boundary, and the cropmark of another barrow is recorded 300m east, of it. Nineteenth century mapping shows likely historic features surrounding the site, including possible mill leats and a walled garden.

Modern activities at the site connected with farming and the operation of the now-undesiganted current Sturmer Hall as a hotel has had some effect on the extent and integrity of the known site but mapping going back to the eighteenth century at least shows phases of development focused on the same spots as the current farm complex.

Impact

The scheme proposes a new SEND school at the site. A new main building is proposed west of the current complex. Existing buildings abutting the scheduled mill site are proposed for conversion and extension, including extending further over the formally designated area. The undesignated historic hall and also a current building between it and the church would be adapted as school administration buildings while a number of lodges, along with new car parking, are proposed in the grounds surrounding the moated



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site. A further building north of the church seems to stand within a historic brick walled enclosure, possibly a survival from a walled garden shown on nineteenth century mapping.

Impacts to the historic environment from the proposals would be both physical and in terms of settings.

Although recent design work to amend the proposals for spa building might be argued to create lower archaeological harm compared to plans for bulk excavation of the monument, we remain very resistant to the proposed construction, landraising and associated works on the scheduled monument because these constitute harm, both physically and also to the legibility of the monument and its setting. The test for Scheduled Monument Consent (SMC) is a high one and any scheme should not be looking to overlay new structures/deposits on a monument, especially not ones that also affect relationships with its associated assets.

The proposed car parking would be located outside the moat monument boundary, but it is very close and its access would still be located inside the monument, meaning vehicle movements on it as well as a settings impact to its immediate west.

The scheme would also create harm outside the monument by further enclosing it with built forms in parts of the complex where no historical development is recorded. The overall effect of the scheme would extend the Sturmer Hall complex and insert elements that interfere with the appreciation of the site in its historic and associated farming setting. Additional harm to undesignated archaeological remains is likely.

Policy

The 2013 DCMS policy position on Scheduled Monuments states that the significance of ancient monuments derives not only from their physical presence, but also from their setting. In determining if requests for SMC should be granted (conditionally or unconditionally) or refused the Secretary of State gives great weight to the conservation of Scheduled Monuments

NPPF 208 requires that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available





evidence and any necessary expertise. They should avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

NPPF 212 places great weight on the conservation of an asset's conservation when considering proposed development's impact on it, irrespective of the level of harm. It goes on to say that any harm or loss of significance requires clear and convincing justification (para 213).

Proposals that create substantial harm should be refused unless that harm is necessary to secure substantial public benefits that outweigh that harm (NPPF 214) while impacts from less-than substantial harm should be weighed against public benefits (NPPF 215).

NPPF 219 encourages that local planning authorities look for opportunities for new development within the setting of heritage assets, to enhance or better reveal their significance.

Position

The proposals pose direct physical harm to the Scheduled Monument and would create additional settings harm to this asset.

Because of their core functional and chronological relationships, a diminution of the significance of the scheduled monument would create harm to the significance of its directly associated assets, including the grade I listed church. On current understanding, Historic England would not support a grant of the necessary Scheduled Monument Consent for the relevant parts of the scheme. The wider scheme, with scattered buildings around a new modern road and parking, would be alien and disruptive in eroding legibility and our ability to understand the relationships between the different assets. This harm to significance could not be supported

There would be benefit in removing some of the unhelpful modern elements, notably the building proposed as the new spa and the building north of the church and adopting a design that centres the relationships between the assets and their surroundings. We would welcome the opportunity to advise on amended proposals and would recommend that the scheme be withdrawn to allow better consideration of the site's sensitivities through fresh pre-application engagement.





Recommendation

Although it is for the Local Planning Authority to determine a planning application and to weigh the harm to Listed and undesignated assets against the public benefits of the proposals, I confirm that Historic England would not support the current scheme in consideration of an application for the necessary parallel Scheduled Monument Consent that is under our remit.

The LPA should be satisfied that the harm, especially to the scheduled monument and grade I listed church, has a robust justification and this scheme is the least harmful option. At present and on the basis of the information provided we remain unconvinced this is the case.

Recommendation

Historic England objects to the application on heritage grounds.

We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 212, 213, 215 and 219.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely

Adam Single

Inspector of Ancient Monuments



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