

Hallam Land Management Limited and
East Hertfordshire District Council
Land North of A507, West of A10 Buntingford

East Hertfordshire District Council Planning Reference: 3/24/0966/OUT
Appeal reference: 6008238

HERITAGE STATEMENT OF COMMON GROUND

9th July 2026

Introduction

- 1.1 This Statement of Common Ground relates to heritage matters. It is prepared and agreed on behalf of Hallam Land Management Limited (the Appellant) and East Hertfordshire District Council (the Local Planning Authority) and relates to Land North of A507, West of A10 Buntingford (the Appeal Site). The Appeal Proposal comprises:

Outline planning application for development of up to 600 dwellings (C3), up to 60 units of elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridges over the A10, with all matters reserved except access.

Supporting Heritage Assessments

- 1.2 Heritage matters were dealt with in a Heritage Statement undertaken by Orion Heritage Limited in May 2024. The methodology, content and conclusions of this report is not in dispute.

Delegated Officer Report

- 1.3 Above-ground heritage matters were considered in detail on page 25 of the Delegated Officer report (F(v)). The content and conclusion of the Delegated Officer report on heritage matters is not in dispute.

Reasons for Refusal

- 1.4 There are four reasons for refusal, none of which relate to heritage matters.

Impact on the Significance of the Heritage Assets Affected by the Proposed Development

- 1.5 As outlined in the heritage assessment submitted in support of the planning application, the Grade II* listed Holy Trinity Church in Throcking (NHLE 1175183) has the potential to be affected by the Appeal Proposal.

- 1.6 The significance of this asset is not in dispute and is summarised as follows:

- 1.7 The significance of the Grade II* listed Holy Trinity Church in Throcking derives principally from the historic and architectural special interest of its built fabric which is manifest in its construction methods and materials, together with its decorative elements and retention of original internal fixtures. The significance of this asset also partially derives from the contribution of its wider setting which provides a rural historic context for the building, including the land within the Appeal Site. It is noted, however, that while the wider rural surroundings of the asset evidence the rural historic context of the church, they make a lesser contribution to the church's overall significance, which principally resides in its inherent historic and architectural special interest and the understanding and appreciation of this within its more proximate rural context in the vicinity of its churchyard.
- 1.8 As outlined in the supporting documentation and Delegated Officer report, the setting of the Grade II* listed Holy Trinity Church, and the contribution that its setting makes to its significance, is not in dispute.
- 1.9 The impact of the Appeal Proposal on the Grade II* listed Holy Trinity Church, as outlined in the Delegated Officer report and agreed by the Appellant, would result in less than substantial harm, at the lower end of the range, arising from a perceptible change of landscape character across land which makes a limited contribution to the overall significance of the asset, which is best understood and appreciated in the vicinity of its churchyard.
- 1.10 The conclusions of the Delegated Officer report agree with Orion Heritage's assessment conclusions on the level of harm to the Grade II* listed Holy Trinity Church. These conclusions are not in dispute.
- 1.11 The heritage section of the Delegated Officer report concludes by outlining that, in accordance with NPPF paragraph 215, the identified level of less than substantial harm has been assessed as part of the overall planning balance for the application. The parties agree that the identified level of less than substantial harm is, by itself, outweighed by the public benefits of the scheme and so does not, of itself, provide a 'strong reason' for refusing to grant permission for the application. This planning balance consideration is not for the heritage experts to undertake so no comment on this is provided in the heritage Statement of Common Ground. The degree of less than substantial harm arising to the significance of the asset is a matter that should be weighed in the overall planning balance.

Signed (for the Appellant)

Gary Stephens

Date: 09/07/2026

Signed (for the Council)

Neil Button

Date: 09/07/2026