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Standing up for Hertfordshire's countryside

Jo Cousins  
Planning and Building Control  
North Hertfordshire District Council  
Council Offices  
Gernon Road  
Letchworth Garden City  
Herts SG6 3JF

Our Ref:

Your Ref:

17<sup>th</sup> April 2020 (by email)

Dear Ms. Cousins,

**Applications Nos. 20/00642/FP and 20/00643/LBC**  
**Change of use of Barn and East & West Stables to ancillary residential accommodation and change of use of land from agricultural to residential. Single storey link extension between Farmhouse and East Stables and between East Stables and Barn and single storey extension to front (east side) of West Stables.**  
**At Rye End Farm, Green Lane, Codicote, Hitchin, Hertfordshire SG4 8SU**

CPRE Hertfordshire are responding to the above applications jointly as they are intimately linked and the documentation accompanying both are identical.

Both Rye End Farmhouse and the outbuildings adjoining it are Grade II listed (National Heritage list nos. 1102759 and 1295870.) Consequently they require to be considered under the provisions of paragraphs 190 - 195 of the National Planning Policy Framework. As the buildings also sit within the Green Belt, the proposed extensions require to be considered against the Green Belt policies in the NPPF and the North Herts Local Plan. As neither application contains a Planning Statement, the applicant fails to address these issues.

NPPF 190 requires the Council to assess the particular significance of any heritage asset that may be affected by a proposal and to take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

NPPF 194 states that any harm to, or loss of significance of a designated heritage asset from its alteration should require clear and convincing justification. In the case of Grade II listed buildings, that justification should be exceptional.

NPPF 195 requires that where a proposed development will lead to substantial harm to a designated heritage asset, local planning authorities should refuse consent, unless it can be

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demonstrated that the harm is necessary to achieve substantial public benefits that outweigh that harm or loss.

Rye End Farm is one of the few remaining fifteenth century yeoman farmhouses in Hertfordshire which remains in its original form. It is particularly well preserved and, as the consultants engaged by the applicant to undertake the Heritage Assessment note: *“The farmhouse and the adjoining complex of outbuildings may thus be regarded as built heritage assets of **High** importance.”* (Their emphasis)

In our view the significance of Rye End Farm is that it is an extant yeoman farm. As such it consists of a farmhouse forming a courtyard with a number of isolated ancillary out-buildings. This proposal will result in those outbuildings being physically joined together with a series of single storey extensions, forming one large residential building. Consequently the intrinsic character of the group, which is part of its Grade II listing, will be lost. The applicant’s own consultants say : *“In terms of the impact of the proposed scheme on the overall external appearance and setting of the Farmhouse and the adjacent Barn and Outbuildings , it is considered that the several glazed links which are currently proposed between the Farmhouse and East Stables and between the Barn and the East and West Stables could cumulatively result in an overly domestic appearance to the setting of these heritage assets, which need to retain their distinct historic character as traditional vernacular farm buildings.”*

The applicant puts forward no justification for the radical alterations to the character of the complex, nor how the conversion into a large domestic property outweighs the harm to the listed buildings or constitutes substantial public benefit.

In preparing the Design and Access Statement accompanying the application, the applicant appears to give no regard to the historic significance of the complex or the significance of its listing. In fact it appears that the DAS was written without benefit of the Heritage Statement, resulting in the applicant submitting an ‘Additional Statement following the preparation of the Heritage Statement.’ This argues that *“ these glass links are crucial for the conversion works that are planned and allow a continuation of flow to all parts of the building without having to access externally to any of the buildings.”*, but that does not constitute exceptional justification. It also refutes the heritage consultants’ proposal that the links could be repositioned by merely saying that *“we do not feel that this is possible”*, without giving any explanation of why they feel it is not possible.

Similarly, the Design and Access Statement makes assertions about the physical condition of the buildings which are not supported by the Structural Assessment. The DAS says: *“ ... due to the negligence of the upkeep of the stables and the main barn all these buildings are very close to collapse and there is a structural report that accompanies this application highlights the significant extent of damage and decay to these structures.”* That is not true. Overall the



fabric is sound, but in need of some repairs. This is typical of most buildings of this age and complexity. The Structural Assessment finds that the roof trusses of the Barn *“require repair locally where a connection has failed.”* And that conversion of the stables and piggery *“is likely to be feasible subject to getting Listed Building Consent for minor repairs and treatment of timber.”* This is hardly ‘very close to collapse.’

As mentioned above, the Heritage consultants have considerable concerns regarding the proposed link extensions, as do we. Apart from the damage they will cause to the character of the farm complex, they may also be contrary to the Green Belt policies in the NPPF and North Herts Local Plan. Clearly they will increase the footprint of the development on the site, but it is not easy to determine the quantum of increase from the plans provided. Consequently the Council will have to ascertain that quantum in order to satisfy themselves whether or not the extensions are permissible under Permitted Development Rights. If not, then the applicant is required to demonstrate very special circumstances sufficient to outweigh the harm to the openness of, or other harm to the Green Belt.

Yours sincerely

David Irving