



Historic England

EAST OF ENGLAND OFFICE

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Our ref: P00488792

24 June 2016

Dear Mr Rand

Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015

**GREAT WILSEY PARK, WILSEY ROAD, LITTLE WRATTING, SUFFOLK
Application No DC/15/2151/OUT**

We have received amended proposals for the above scheme.

Summary

The amended outline application comprises residential development of up to 2,500 units, two primary schools, two local centres including retail, community and employment uses with open space, landscaping and associated infrastructure. The application includes amended parameter plans, a covering letter and an addendum to the Environmental Statement (hereafter referred to as ES Addendum).

Historic England provided advice on the original outline application (letter dated 21st December 2015). We identified that the proposed development would impact upon the setting of the scheduled monument known as the 'Moated site at Great Wilsey Farm' (List Entry No. 1020175) resulting in a high level of harm. We recommend the Local Planning Authority sought refinements to the parameter plans in order to reduce and mitigate that harm. The residual harm that cannot be mitigated would then need to be weighed against the wider public benefits delivered by the proposal. The amended outline application has not addressed any of our comments or made any changes to the proposals in order to reduce and mitigate the harm to the scheduled monument.

Historic England Advice

The current undeveloped nature of the surrounding rolling landscape is a vital element of the monument's setting - the surroundings in which it is experienced. These surroundings have changed over time; however they remain very much an agrarian landscape in which the changes have reflected advances in farming practice and in which the existing built forms (e.g. those in close proximity to the monument) simply reflect the post-medieval and modern development of the farm and moated site. As



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noted in *Good Practice Advice in Planning 3: The Setting of Heritage Assets*, settings of heritage assets which closely resemble the setting in which the asset was constructed are likely to contribute to significance. Although the existing landscape is not identical the moat's contemporary medieval or post-medieval surroundings, it still retains the important open aspects and an undeveloped, agricultural, rural and isolated character which provides historic context and echoes the original setting. It adds to our understanding of the monument's historical development. In our view, the setting better reveals and makes a very important contribution to the significance of this designated heritage asset.

The change that is now proposed is something fundamentally different than the monument's existing setting. The proposed development would result in the introduction of large blocks of urban built forms and infrastructure, changing a large section of the moated site's setting into, essentially, a suburban townscape. This would substantially impact how the scheduled monument is experienced, not only from inside the monument and looking out, but also when traversing around the designated area and approaching it via the many historic footpaths and routes that cross the landscape between Kedington and Haverhill. It is our view that this would have an adverse impact upon the setting and result in a high level of harm to the significance of the scheduled monument.

The current parameter and master plans show the application site boundary cut back to exclude a parcel of land on the south / southwest side of the farm and moated site. This retains a degree of openness on this side of the monument, lessening the level of adverse impact and harm. Similarly, the application site stops short of the north / northeast sides, which retains the link with the wider landscape in this direction and reduces the impact, although the views and approaches to the monument from all these directions would still be impacted. The most notable impact would occur on to southeast and northwest, and the outline application included proposals to mitigate the resulting harm (see submitted parameter plans). This comprised ensuring the housing nearest to the scheduled monument (blocks A3, A5 and north-western edge of A10) were at the lowest density of 20-25 dwellings per hectare, and that the buildings in these areas would only be up to two storeys in height. It also proposed the introduction of tree screens along the edge of the application site to both the southeast and northwest sides of the monument.

We noted these mitigation measures in our December 2015 comments, and whilst we acknowledged they would reduce the impact to some degree; the effect was limited and we concluded that the development would still result in a high level harm to the significance of the scheduled monument. In response to our comments, Chapter 14 of the ES Addendum states that development in the setting of the scheduled monument has been significantly reduced from that set out within the Concept Statement (Haverhill Vision 2031), with low density housing proposed in the area nearest to the



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moated site and a high density block completely removed from the south/southwest. The addendum states *'It is therefore the case that significant mitigation has already been undertaken to reduce the potential impact on the Scheduled Monument'*. We disagree with this statement and remain of the view that further mitigation could be included. The addendum also states that details from the site's Masterplan (approved September 2015) and paragraph 28 of the Concept Statement ensure that *'at detailed design stage development in these areas closest the moated site will have an appropriately rural character, avoiding the suburban character that Historic England consider will be inevitable in these areas'*. We also disagree with this statement. The development by its nature is a suburban creation on the edge of Haverhill with large blocks of housing and urban infrastructure which, even with a landscape-led design, would still fundamentally change the rural, agricultural and undeveloped setting of a historically isolated moated site. Further to this, we also note the statements in the ES Addendum that our comments were *'broadly supportive'* and that we acknowledged the harm to be less than substantial. Whilst we did not object to the outline application, we would not characterise our comments as *'broadly supportive'*. Furthermore, whilst we concluded that the level of harm would be below the threshold of substantial harm, and therefore *'less than substantial'* (defined in the NPPF), we clearly stated that it would still be a high level of harm, concluding that it would be *'towards the upper end of the spectrum of harm'*. This has been ignored by the ES Addendum.

We acknowledge that that current outline application has a reduced density from that shown at the Concept stage; however a density in the range of 20 -25 dwellings per hectare would still create a distinctly suburban rather than rural character and have a notable impact upon the setting of the scheduled monument. The development as a whole would erode the open character around the monument, divorcing it from the surrounding landscape and its historical context. In terms of the proposed landscape belts, we continue to consider that these are only of modest depth and unlikely to afford much screening, particularly in the winter months. We note that the amended outline application now shows the south-eastern belt to be split by an access track for agricultural vehicles; which would further limit the effectiveness of the screening. We also note that the size of these belts are smaller than those indicated in the Concept documents; in particular the 'Concept Plan', which showed two areas (one to the northwest and one to the southeast) far larger than the current screening belts and marked as *'Green space to protect setting of SAM and existing residences'*. These are no longer showing on any of the outline application plans. In addition to this, it is important to also recognise that the moated site lay within an important rolling landscape (as described above) and the enclosing it between blocks of linear woodland, even to screen the encroaching housing, would itself change that experience and cause harm. The negative effect that screening can have on the significance of a scheduled monument has been examined at a recent public enquiry (Priory Maze and Gardens, Beeston Regis - APP/Y2620/W/15/3132403) which determined that the screen would in itself be harmful.



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The purpose of the planning system is the achievement of sustainable development, a presumption in favour of this is at the heart of the National Planning Policy Framework (NPPF) (paragraphs 6 and 14). To achieve, this economic, social and environmental gains - including protecting and enhancing the historic environment, should be jointly sought (paragraphs 7 and 8). Paragraph 129 of the NPPF requires local planning authorities to take into account the particular significance of any heritage assets affected by a proposal, in order to avoid or minimise conflict between the heritage asset's conservation and any aspect of that proposal. Paragraphs 132 and 134 builds on this and state that when considering the impact on the significance of a designated heritage asset, great weight should be given to the asset's conservation and more important the asset, the greater the weight should be. Scheduled monuments, such as the moated site at Great Wilsey, are considered to be heritage assets of the highest significance. *Any* harm requires clear and convincing justification and must be weighed against the public benefits of the proposals. Paragraph 137 goes onto state that local planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance, treating favourably those proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset. The current application does not include any amendments or alterations which address our comments of 21st December 2015 or which reduce the harm to the scheduled monument. Indeed, the changes to the access track could be argued to have limited the effectiveness of the south-eastern screening belt and increased the adverse impact. We therefore remain of the view that the proposed development would result in harm to the significance of the scheduled monument, in line with paragraphs 132 and 134 of the NPPF. It has not sought to minimise the conflict between the asset's conservation and the proposal, in line with paragraph 129, and would not enhance or better reveal significance, in line with paragraph 137. Whilst we do not consider the current proposals to result in 'substantial harm', we remain of the view that the level of harm would be very high and therefore must be justified and clearly outweighed by the public benefits of the proposals.

Design scheme changes could be incorporated into the proposals which would reduce the impact upon setting of the scheduled monument and allow the public benefits to be achieved through a less harmful scheme. These amendments are discussed above and could include cutting back and moving away the housing in proximity to the moated site and increasing and improving the quality of the green open space and planting belts to the southeast and northwest (such as originally illustrated in the Concept documents). As stated in our previous advice, it is only once this harm had been further mitigated that we would consider it appropriate for the Council to then weigh the residual harm against the wider public benefits of the proposal.

The amended outline application has not made any changes to the proposals in order



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to reduce the impact upon the setting of the scheduled monument, as we previously recommended. We do not consider sufficient effort has been made to minimise the conflict between the heritage asset's conservation and the proposal, or to reduce and mitigate the resulting harm to significance. It is our view that the application should be withdrawn, or the decision deferred, to allow design scheme changes to be incorporated that would reduce the impact and the level of harm. Should the Council proposed to determine the application in its current form, we would recommend planning permission is refused unless you are fully satisfied that there is clear and convincing justification for the high level of harm, and satisfied that the harm is clearly outweighed by public benefits which could not be realised through a less harmful scheme.

We would recommend conditions are attached to any approval which would require all landscape planting belts to be planted in the first season after commencement of the development, and for the development to commence with those blocks to the southwest of the stream that flows between Great Wilsey Farm and Haverhill. This will enable the new planting to become established ahead of the construction of new houses northeast of the stream, ensuring the screening reaches maturity at the earliest possible date. The Council should also consider what whether there are opportunities which could be Conditioned to ensure the proposals enhance or better reveal significance of the designated (and non-designated) heritage impacted by the development. This could include improvements to the condition, management and access of assets, new interpretation and comprehensive dissemination and presentation of the results of any archaeological and cultural heritage works undertaken as part of the development. We understand Suffolk County Council Archaeological Service has advised on the non-designated aspects of the proposals and we support their recommendations for on-site archaeological works.

Recommendation

It is our view that the application would result in a very high level of harm. We would recommend the outline application is withdrawn or decision deferred to allow design scheme changes to be incorporated that would reduce the impact of the development upon the setting of the scheduled monument and minimise the harm to its significance.

If the Council proposes to determine the scheme in its current form, we would recommend the application is refused unless the Council is fully satisfied that there is clear and convincing justification for the level of harm, that the harm it is outweighed by public benefits of the proposal, and that the same benefits could not be delivered through a less harmful scheme.

We would welcome the opportunity of advising further. Please consult us again if any additional information or amendments are submitted. If, notwithstanding our advice, you propose to approve the scheme in its present form, please advise us of the date of



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the committee and send us a copy of your report at the earliest opportunity.



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cc. Kate Batt, Senior Archaeology Officer, Suffolk County Council Archaeological Service



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