



Historic England

EAST OF ENGLAND OFFICE

Mr Chris Rand
St. Edmundsbury Borough Council
PO Box 122
BURY ST. EDMUNDS
Suffolk
IP33 3YS

Direct Dial: 01223 582751

Our ref: P00488792

2 December 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 current application includes amended illustrative masterplan, landscaping plan and site section. Historic England provided advice on the original outline application (letter dated 21st December 2015) and subsequent amendments (letter dated 24th June 2016). Those letters should be read in conjunction with our advice below.

It is our view 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. Our previous planning advice recommend the Local Planning Authority sought refinements to the proposed parameter plans in order to reduce and mitigate that harm. It was only once that harm had been mitigated that we would consider it appropriate for the Council to then weigh the residual harm against the wider public benefits of the proposal, in line with the National Planning Policy Framework.

Historic England Advice

The Moated site at Great Wilsey Farm lies within an open and rolling rural landscape. The monument was historically isolated and this undeveloped landscape surrounding the site is an important element of its setting. It reflects the moat's contemporary setting and its change over time, and provides historic context. The setting better reveals and makes an important contribution to the significance of the scheduled monument.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

EAST OF ENGLAND OFFICE

The proposed development would dramatically change a large section of this rural landscape into a suburban townscape, eroding the setting of the scheduled monument. The original and amended applications (November 2015 and May 2016) have incorporated elements to limit that impact upon the monument's setting. This has included retaining an undeveloped parcel of land on the south / southwest side of the moated site and no development at all on the north / northeast sides - which retains the link with the wider landscape in this direction (although the views and approaches to the monument from all directions would still be impacted). It was proposed that the impact would be further tempered by all housing nearest to the scheduled monument (blocks A3, A5 and north-western edge of A10) being restricted to the lowest density of 20-25 dwellings per hectare and only up to two storeys in height (as opposed to the higher densities proposed during the Concept stage of the development). Finally, tree screens were proposed along the edge of the application site to both the southeast and northwest of the monument.

Our previous advice (dated 24th June 2016) welcomed the steps that had been taken to address the impact upon the scheduled monument. However, it remained our view that the overall effect of these would be limited and that additional changes could still be included - such as further reductions in building density and increasing the size and depth of the screening and landscaping belts. The current amendments (October 2016) propose the planting of an additional 5m wide tree belt on the boundary of the application site to the southwest of the scheduled monument. We welcome this amendment which adds additional screening and would help reduce the visual impact of the proposed housing and infrastructure. However, no other amendments or changes are proposed.

It remains our view that the proposed development would erode the open character of the landscape around the monument. It is a suburban creation on the edge of Haverhill with large blocks of housing and urban infrastructure which, even with a landscape-led design and screening belts, would fundamentally change the rural, agricultural and undeveloped setting of this historically isolated moated site. We would consider this impact to result in harm to the significance of the scheduled monument. As discussed above, we note the steps taken to limit the visual impact of the development and reduce that level of harm. Whilst we welcome the improvements in the screening, we would highlight that enclosing the moated site within blocks of linear woodland (even to screen the encroaching housing) would itself change the experience and cause some harm.

We would therefore still consider the proposed development to result in a high level of harm to the significance of the scheduled monument. We remain of the view that additional design scheme changes (as discussed above and previously) could be incorporated to produce a less harmful scheme and we would encourage the applicant and the Council to consider where the current application could be further amended.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





Historic England

EAST OF ENGLAND OFFICE

We do however note the planning history of this development and that the principle of this urban extension to Haverhill has long been accepted. We recognise that there are strong arguments for the public benefits of the application as it presently stands, and that the Council is likely to be minded to determine the application in its current form. When considering this application, the Council would need to be fully satisfied that the public benefits of the proposal outweigh the harm to the significance of the scheduled monument and that there is clear and convincing justification for that harm. This is in line with paragraphs 132 and 134 of the National Planning Policy Framework (NPPF). The Council should look at the design and amendments proposed thus far and ensure you are satisfied that, in line with NPPF Paragraph 129, sufficient effort has been made to minimise the conflict between the heritage asset's conservation and the proposal - e.g. that enough has been done to minimise the impact upon setting of the scheduled monument. We would strongly recommend the Council also look for opportunities for this development to enhance or better reveal the significance of the scheduled monument, in line with NPPF Paragraph 137.

Should the application be approved, we would recommend Conditions are attached 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 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 - for example 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 remains our view that the application would result in a high level of harm to the significance of the scheduled monument. Our previous advice recommended the application should be withdrawn, or the decision deferred, to allow design scheme changes to be incorporated. We note that additional screening has been provided and whilst this does reduce the visual impact to some degree, the effect of this would be limited and would not change the overall level of harm. We remain of the view that additional changes could be incorporated and we would encourage the applicant and the Council to consider where the application could be further amended.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk





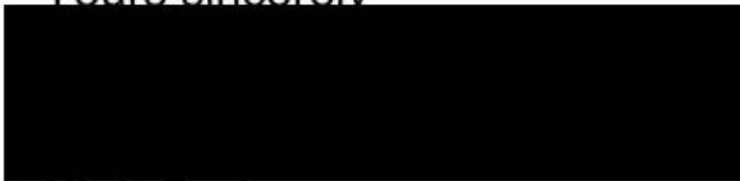
Historic England

EAST OF ENGLAND OFFICE

However, we acknowledge that the Council is likely to determine the application in its current form. In line with our previous advice, we would therefore recommend the application is approved only if the Council is 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. Should the application be approved, we would recommend Conditions are attached (as detailed above) to ensure the impact upon the setting of the scheduled monument is curtailed and ensure the proposals enhance or better reveal significance of the designated (and non-designated) heritage.

We would welcome the opportunity of advising further should additional information or amendments be submitted. If the Council approves the scheme in its present form, please advise us of the date of the committee and send us a copy of your report at the earliest opportunity

Yours sincerely



Nick Carter

Assistant Inspector of Ancient Monuments
E-mail: nick.carter@HistoricEngland.org.uk

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



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk

