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Our ref: P01067571

7 May 2019

Dear Ms Mills

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

LAND NEAR HAVERHILL, WILSEY ROAD, LITTLE WRATTING, SUFFOLK Application No. DC/19/0834/RM

Thank you for your letter of 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 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 reserved matters application includes access, landscaping, layout and scale for the first phase of development. Historic England provided advice on the original outline application (letter dated 21st December 2015) and subsequent amendments (letters dated 24th June 2016 and 2nd December 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.

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 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 2nd December 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 reserved matters application proposes a 'woodland edge' planting of trees, grass, and swales on the boundary of the application site to the southwest of the scheduled monument (A3 and A5). We welcome this amendment which provides a more appropriate setting to the Scheduled Monument than previously proposed and would help reduce the visual impact of the proposed housing and infrastructure.

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 have commented previously on the proposed density of housing (20-25 units per hectare) in Areas 5 and 10 and will comment again when the reserved matters for housing densities and spacing is submitted as well as the landscaping proposals for Area 10 (Phase 2).

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 the landscape planting belts in Area 5 to be planted in the first season after commencement of the development. This will enable the new planting to become established ahead of the construction of new houses in Area 5, 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

Historic England has no objection to the application on heritage grounds.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

Yours sincerely



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