

Chapter 10: Cultural Heritage

Land off Duke's Park, Woodbridge

ENVIRONMENTAL STATEMENT

November 2015

10.1 INTRODUCTION

10.1.1 This chapter relating to Cultural Heritage has been prepared by CgMs Consulting and provides an assessment of built cultural heritage assets and considers the likely significant effects of the proposed development on these resources.

10.1.2 This chapter describes the methods used to establish baseline conditions currently existing on the site; the methodology used to determine potential effects and the mitigation measures required to prevent, reduce or offset (where possible) any significant adverse effects; and the likely effects after these measures have been implemented.

10.1.3 Cultural heritage includes a wide range of features resulting from human intervention in the landscape, varying in scope from buried archaeological remains up to late 20th century industrial structures. For the purpose of this assessment cultural heritage is set out below:

- Built Heritage
- Conservation Areas (statutory)
- Listed Buildings (Grades I, II*, and II) (statutory)
- Registered Parks and Gardens
- Locally listed buildings (non-statutory)
- World Heritage Sites (WHS)
- Scheduled Monuments

10.1.4 Archaeology and below-ground cultural heritage is not considered in this chapter.

10.2 METHODOLOGY

10.2.1 Assessment of effects on cultural heritage resources of the proposed development has been conducted in line with the latest and most comprehensive guidance¹. These guidelines do not provide a prescriptive approach to assessment but identify principles and good practice that have been applied in the methodology for this assessment.

10.2.2 In order to inform the preparation of this chapter additional survey work has been carried out, namely:

- A Built Heritage Assessment, also including a site visit, carried out in May 2014 (Appendix 10.1).

10.2.3 Baseline historic environment data was also recovered for an area within a 1 km radius of the site boundaries to ensure that, in addition to records of evidence within the site, relevant records from the surrounding area could also be considered and, where necessary, consideration could be given to heritage assets that might be affected. The following data sources have been used in the compilation of baseline data:

- Suffolk Historic Environmental Record (HER);
- Historic England National Monument Record, Swindon (NMR);

¹ Design Manual for Roads and Bridges Volume 11; Section 3; Part 2 'Cultural Heritage' (DMRB) published by the Highways Agency in 2007, and "The Setting of Heritage Assets: English Heritage Guidance" published by English Heritage in 2011

- Historic England National Heritage List for England (NHL);
- Suffolk Record Office;
- Published/unpublished sources;
- Site inspection and map regression exercise.

Significance criteria

Assessment of Direct and Indirect Effects on Heritage Assets

10.2.4 The determination of magnitude of effect is based on the level of effect that the proposed development may have on cultural heritage resources, together with the current state of survival/condition of the receptor, taking into account the nature of past development or management effects. These effects could include temporary or permanent land take or excavation, ground disturbance and compaction.

10.2.5 Development effects can be characterised as to whether they would be:

- Direct or Indirect;
- Short, Medium or Long Term;
- Reversible or Irreversible; and/or
- Cumulative.

10.2.6 The magnitude of effect is assessed by taking into consideration the extent/proportion of the asset affected, its type, its survival/condition, its fragility/vulnerability and its potential amenity value (Table 10.1). In considering the above factors the criteria for assessing the magnitude of predicted change on cultural heritage resources are given in Table 10.3. Both physical and setting effects are included, as harm to significance can result through loss to, or development within, the setting of a heritage asset.

Table 10.1 Significance of Assets

Importance/Significance	Description
Very High	<ul style="list-style-type: none"> • World Heritage Sites
High	<ul style="list-style-type: none"> • Scheduled Monuments • Protected Wreck Sites • Registered Battlefields • Grade I and II* listed buildings • Grade I and II* registered parks and gardens • Grade II listed buildings • Grade II registered parks and gardens • Registered Historic Landscapes • Conservation Areas

Importance/Significance	Description
Medium	<ul style="list-style-type: none"> Local Authority designated sites and their settings Non-designated sites or assets of demonstrable regional importance
Low	<ul style="list-style-type: none"> Sites or assets with specific and substantial importance to local interest groups Sites or assets whose significance is limited by poor preservation and poor survival of contextual associations

Table 10.2 Criteria for Assessing the Magnitude of Impacts

Magnitude	Direct Impacts	Indirect Impacts
High Adverse	<ul style="list-style-type: none"> Total or substantial loss of the significance of a heritage asset. 	<ul style="list-style-type: none"> Substantial harm to a heritage asset's setting, such that the significance of the asset would be totally lost or substantially reduced (e.g. the significance of a designated heritage asset would be reduced to such a degree that its designation would be questionable; the significance of a non-designated heritage asset would be reduced to such a degree that its categorisation as a heritage asset would be questionable).
Medium Adverse	<ul style="list-style-type: none"> Partial loss or alteration of the significance of a heritage asset. 	<ul style="list-style-type: none"> Considerable harm to a heritage asset's setting, such that the asset's significance would be materially affected/considerably devalued, but not totally or substantially lost.

Magnitude	Direct Impacts	Indirect Impacts
Low Adverse	<ul style="list-style-type: none"> Slight loss of the significance of a heritage asset. This could include the removal of fabric that forms part of the heritage asset, but that is not integral to its significance (e.g. the demolition of later extensions/additions of little intrinsic value). Perceivable level of harm, but insubstantial relative to the overall interest of the heritage asset. 	<ul style="list-style-type: none"> Some harm to the heritage asset's setting, but not to the degree that it would materially compromise the significance of the heritage asset.
Negligible/ Neutral	<ul style="list-style-type: none"> A very slight change to a heritage asset. This could include a change to a part of a heritage asset that does not materially contribute to its significance. 	<ul style="list-style-type: none"> Very minor change to a heritage asset's setting such that there is a slight impact not materially affecting the heritage asset's significance.
Low Beneficial	<ul style="list-style-type: none"> Slight enhancement to the fabric of the heritage asset. 	<ul style="list-style-type: none"> Slight enhancement to the setting of the heritage asset.
Medium Beneficial	<ul style="list-style-type: none"> Moderate enhancement to the fabric of the heritage asset. 	<ul style="list-style-type: none"> Moderate enhancement to the setting of the heritage asset.
High Beneficial	<ul style="list-style-type: none"> High levels of enhancement to the fabric of the heritage asset. 	<ul style="list-style-type: none"> High levels of enhancement to the setting of the heritage asset.

Significance of Effects

- 10.2.7 The sensitivity of a heritage asset depends on factors such as the condition of the asset and its perceived heritage value/importance. The sensitivity of the heritage asset is also defined by its importance in terms of national, regional or local statutory or non-statutory protection and designations.
- 10.2.8 The non-statutory criteria used by the Secretary of State for Scheduling Ancient Monuments provide relevant criteria to assist this process, as does the advice contained at paragraphs 113 to 124 of the PPS5 English Heritage Historic Environment Planning Practice Guide and Paragraph 132 of the National Planning Policy Framework. Table 10.4 sets out the criteria for assessing sensitivity.
- 10.2.9 The sensitivity of the receiving environment, together with the magnitude of effect, defines the significance of the effect as set out in Table 10.4. The environmental effect outlined below represents the effect on the significance of the heritage assets without mitigation. A significance

of effect of 'major' or 'moderate' would be considered to equate to significant effects highlighted in the context of Environmental Impact Assessment (EIA) Regulations.

Table 10.3 Significance of Effect

Magnitude of Impact	High	Medium	Low	Negligible/ Neutral
International Importance	Very Major	Major	Moderate	Minor
National Importance	Major	Moderate	Minor	Negligible
Regional/ County Importance	Moderate	Minor	Negligible	Negligible
Local Importance	Minor	Negligible	Negligible	Negligible/neutral
Negligible Importance	Negligible	Negligible	Negligible/neutral	Neutral

Cumulative Effects

10.2.10 Below is a list of approved and pending future projects within the vicinity of the site which will be considered later in this chapter in respect of cumulative environmental effects of built heritage. These will be considered in more detail in section 10.8.

- DC/14/0991/OUT – Land north of Woods Lane, Melton, Suffolk; outline planning application for up to 180 dwellings with all matters except access reserved; approved 2 September 2015;
- DC/14/0715/OUT – Land to rear of Cedar House, Pyches Road, Melton, Suffolk; Erection of 10 dwellings (including 3 affordable dwellings) formation of vehicular access from The Grove; approved 12 June 2015;
- C/09/0555 – Adastral Park; refurbishment of Adastral Park and development of adjoining land to provide up to 60,000 square metres additional floorspace; erection of 2000 dwellings; mixed-use centre; education provision; hotel; energy centre; public park; pending;
- Woodbridge Football Club; 95 houses including 32 affordable homes; application yet to be submitted;
- C/10/1906 – Land south of Main Road, Martlesham, Suffolk; erection of 180 dwellings together with associated garages, parking, landscaping and access off Main Road and open space; Approved 4 July 2013;
- C/13/0806 – East Anglia Offshore Wind Project and Galloper Wind Farm; Approved 17 June 2014.

10.3 PLANNING POLICY CONTEXT

Legislation

Planning (Listed Buildings and Conservation Areas) Act 1990

- 10.3.1 Legislation regarding buildings and areas of special architectural and historic interest is contained within the **Planning (Listed Buildings and Conservation Areas) Act (1990)** ("the 1990 Act").
- 10.3.2 The relevant legislation extends from Section 66 of the 1990 Act, which states that 'special regard' must be given by the decision maker in the exercise of planning functions to the desirability of preserving the building or its setting or any features of special architectural or historic interest that the building possesses.
- 10.3.3 In addition, Section 72 of the Act relates to conservation areas and states that special attention shall be paid to conserving or enhancing the character or appearance of the conservation area.

National Planning Policy Framework (March 2012) and Planning Practice Guidance (March 2014)

- 10.3.4 The **National Planning Policy Framework ("NPPF")**, published in March 2012, sets out the Government's planning policies for England and how these are expected to be applied. The relevant guidance of the purposes of this Chapter is found in Section 12 'Conserving and Enhancing the Historic Environment'. The NPPF continues the philosophy that was upheld in PPS5 in moving away from narrow or prescriptive attitudes towards development within the historic environment, towards intelligent, imaginative and sustainable approaches to managing change.
- 10.3.5 Paragraph 128 of the NPPF states that, when determining applications for development, the local planning authority should require applicants to describe the significance of the heritage assets likely to be affected by the development, including any contribution made by their setting. In carrying out this exercise it is noted that the level of detail provided should be proportionate with the significance of the heritage asset. Paragraph 129 requires that the local planning authority should also identify and assess any heritage assets likely to be affected by a proposed development.
- 10.3.6 Paragraphs 132-136 consider the impact of a proposed development upon the significance of a heritage asset. Paragraph 132 emphasises that when a new development is proposed, great weight should be given to the asset's conservation and that the more important the asset, the greater this weight should be. It is further noted that significance can be harmed or lost through alteration or destruction of the heritage asset, or development within its setting. However, as is confirmed in English Heritage guidance, setting is not a heritage asset or designation in its own right.
- 10.3.7 Paragraph 133 requires that, where a proposed development will lead to substantial harm to or total loss of, a heritage asset, the local planning authority should refuse consent unless it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits. Paragraph 134 states that where any harm is considered to be less than substantial, this harm should be weighed against the public benefits of the scheme.

10.3.8 The NPPF is supported by the Planning Practice Guidance (PPG). In relation to the historic environment, paragraph 18a-001 states that:

“Protecting and enhancing the historic environment is an important component of the National Planning Policy Framework’s drive to achieve sustainable development (as defined in Paragraphs 6-10). The appropriate conservation of heritage assets forms one of the ‘Core Planning Principles’”.

10.3.9 Paragraph 18a-002 makes a clear statement that any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 as well as satisfying the relevant policies within the NPPF and the Local Plan.

10.3.10 Paragraph 18a-013 outlines that the assessment of the impact of a proposed development on the setting of a heritage asset needs to take into account and be proportionate to the significance of the asset being considered and the degree to which the proposed development enhances or detracts from the significance of the asset and the ability to appreciate the significance.

10.3.11 The NPPG outlines that although the extent and importance of setting is often expressed in visual terms, it can also be influenced by other factors such as noise, dust and vibration. Historic relationships between places can also be an important factor stressing ties between places that may have limited or no intervisibility with each other. These may be historic as well as aesthetic connections that contribute or enhance the significance of one or more of the heritage assets.

10.3.12 Paragraph 18a-013 concludes stating:

“The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation”.

10.3.13 The key test in NPPF paragraphs 132-134 is whether a proposed development will result in substantial harm or less than substantial harm. However, substantial harm is not defined in the NPPF. Paragraph 18a-017 of the NPPG provides additional guidance on substantial harm. It states:

“What matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting. Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed”.

10.3.14 Paragraph 134 of the NPPF outlines that where a proposed development results in less than substantial harm to the significance of a heritage asset, the harm arising should be weighed against the public benefits accruing from the proposed development. Paragraph 18a-020 of the NPPG outlines what is meant by public benefits:

“Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 7). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits”.

National Guidance

Conservation Principles – Policies and Guidance (English Heritage, 2008)

10.3.15 Conservation Principles outlines Historic England's approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in Historic England's own advice and guidance, the document is recommended to LPAs to ensure that all decisions about change affecting the historic environment are informed and sustainable.

10.3.16 The guidance describes a range of heritage values which enables the significance of assets to be established systematically, with the four main 'heritage values' being:

- Evidential value: the potential of a place to yield evidence about past human activity.
- Historical value: the ways in which past people, events and aspects of life can be connected through a place to the present.
- Aesthetic value: the ways in which people draw sensory and intellectual stimulation from a place.
- Communal value: the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

Historic Environment Good Practice Advice in Planning: Note 3 (GPA3): The Setting of Heritage Assets (Historic England, 2015)

10.3.17 This advice note focuses on the management of change within the setting of heritage assets. This guidance updates that previously published by English Heritage (The Setting of Heritage Assets 2011) in order to ensure that it is fully compliant with the NPPF and is largely a continuation of the philosophy and approach of the 2011 document. It does not present a divergence in either the definition of setting or the way in which it should be assessed.

10.3.18 Setting is defined as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'. The guidance emphasises that setting is not a heritage asset or a heritage designation and that its importance lies in what it contributes to the significance of the heritage asset itself. Elements of setting may make a positive, negative or neutral contribution to the significance of a heritage asset.

10.3.19 While setting is largely a visual concept, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, setting,

and thus the way in which an asset is experienced, can also be affected by other environmental factors, including historic associations.

10.3.20 This document states that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset. It is further stated that the contribution made to an asset's significance by their setting will vary depending on the nature of the asset and its setting. Different heritage assets have the capacity to accommodate change differently within their settings, possibly without harming the significance of the asset (or even enhancing its significance) and, therefore, setting should be assessed on a case-by-case basis. Although not prescriptive in setting out how this assessment should be carried out, Historic England recommend using a '5-step process' to assess any effects of a proposed development on the setting and significance of a heritage asset:

- 1) Identifying the heritage assets affected and their settings;
- 2) Assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
- 3) Assessing the effect of the proposed development on the significance of the asset(s);
- 4) Maximising enhancement and minimising harm; and
- 5) Making and documenting the decision and monitoring outcomes.

Local

10.3.21 Suffolk Coastal District Council defines the local planning policy context for the area, with the **Suffolk Coastal District Local Plan: Core Strategy and Development Management Policies: Development Plan Document (July 2013)** being the first and central part of the new local plan which is currently being prepared and adopted by the Council. However there are no policies that are directly relevant to built heritage and this report.

10.3.22 In addition there are a number of saved policies from the **Suffolk Coastal Local Plan (adopted February 2001; saved policies July 2013)** however none of these are relevant to this chapter.

BASELINE CONDITIONS

10.3.23 The baseline has been established by the Built Heritage Statement, included as Appendix 10.1.

Assessment of Significance

10.3.24 The following section describes the key heritage receptors (where there is potential for impact from the proposed development) and considers their significance, including the contribution that their settings (including the site) make to that significance. Further detail on the identified heritage assets can be found in Appendix 10.1.

1 Top Street

10.3.25 1 Top Street is a Grade II Listed Building constructed in the late eighteenth century. It is constructed from red brick with a pantiled roof and has crow-stepped gables (more commonly referred to as Dutch Gables) which are relatively common throughout East Anglia. The building is located c.20 metres west of the site boundary, fronting Top Street to the east. The building is set

within its own domestic curtilage, which also includes a small single-storey ancillary building, with views from the building generally limited to linear views to the west over Top Street, and from first floor level to the east, over the asset's rear garden, towards the site.

10.3.26 The setting of the building within its own grounds reflects the original intended function of the building as a detached private residence, which has been maintained until the present day, thus contributing to the value of the building and providing illustrative historic value through providing information on the construction and setting of eighteenth-century dwellings. The building is likely to have been built on the historically important thoroughfare of Top Street in order to ease movement both to and from the house and this therefore provides further illustrative value. To the east, the building has a small domestic garden, which positively contributes to its value through reflecting both its historic and current use as a private residence. Beyond this the site is present, although views between the two are extremely limited due to the twentieth-century tree planting within the asset's garden.

10.3.27 1 Top Street is a heritage asset of high sensitivity, as attested by its statutory designation. The immediate setting of the asset (its private domestic curtilage) makes some positive contribution to this sensitivity, while its extended setting (its aspect west over Top Street and east towards the site) makes a very limited contribution. The sensitivity of 1 Top Street is therefore primarily derived from its special architectural and historic interest, with its setting making a limited positive contribution, to which the site makes a negligible contribution.

Data Limitations

10.3.28 Listed buildings were only assessed from publicly accessible areas and the site, due to them being in private ownership.

10.4 POTENTIAL EFFECTS

10.9.1 This section provides a description of the potential significance effects that could arise from the proposed development during construction and once operational, including cumulative effects with other proposed development.

10.9.2 Sources of impacts on Cultural Heritage receptors may include:

- Soil stripping and ground re-profiling;
- Cutting of new roads, foundations and associated services;
- General hard and soft landscaping of the site;
- Increased traffic and construction noise;
- General construction site character; and
- Indirect visual setting affects.

Construction

10.9.3 During the construction phase, there may be some indirect temporary effects arising through the construction including dust, traffic and noise. However, the temporary nature of these effects and the fact that they will generally be similar to those experienced during the operational phase, means that these effects are assessed together below.

Operational

10.9.4 The effects arising from the operational phase will include the alteration of some views through the provision of new housing and woodland, in addition to other environmental effects including the additional noise arising from traffic and the occupation of the proposed dwellings.

10.5 PROJECT DESIGN

10.5.1 The application is for outline planning permission of up to 215 dwellings with structural planting, landscaping and infrastructure. No demolition will be proposed for the site because it is currently an open agricultural field containing no buildings or structures. A building set-back will be provided in the northwest of the site, which will include a new wooded area, which will help to maintain a rural buffer from 1 Top Street. This will be connected to the remainder of the site by a green corridor, with built development proposed either side.

10.5.2 Access will be provided from two points, one from Top Street on the west boundary of the site and one from Ipswich Road to the north of the site.

10.6 ASSESSMENT OF EFFECTS

Heritage Effects (both construction and operational effects)

1 Top Street

10.6.1 The proposed development will partially erode a small part of the rural context currently provided by the site, which also serves to demarcate the building from the wider settlement of Woodbridge, thus reflecting its semi-rural setting. It is not considered that this setting makes only a negligible contribution to the significance of the heritage asset. The design outlined above, notably the planting of woodland within closest proximity to the asset, will further minimise any impact. Therefore the proposed development will result in a negligible minor adverse impact to the sensitivity of 1 Top Street.

10.7 RESIDUAL EFFECTS

Table 10.4 Residual Effects

Description	Significance of effect (Table 10.3) prior to mitigation	Proposed mitigation	Residual effect
1 Top Street	Negligible indirect	Construction Management Plan; detailed design of lighting, highways and infrastructure. Woodland buffer to maintain element of rural aspect.	Negligible indirect

10.8 CUMULATIVE EFFECTS

10.8.1 This section assesses the likely significant effects of the proposed development when considered in the context of other proposed and/or consented developments. It is considered that due to the relative distance from the site and particularly from 1 Top Street, of those developments identified

at paragraph 10.2.11, only two have the potential to have any cumulative effects, in conjunction with the proposed development.

- Woodbridge Football Club; 95 houses including 32 affordable homes; application yet to be submitted. The location of this proposed development site ensures that it will, in conjunction with the proposed development, serve to expand Woodbridge to the west, in closer proximity to 1 Top Street. However, despite it being slightly elevated above the level of 1 Top Street and much of the site, it is unlikely to have any visual effect on 1 Top Street and therefore no cumulative effect is predicted. It should however be noted that no application has been submitted and therefore the exact details of this scheme could not be ascertained and this conclusion is therefore based on an expectation that development will be wholly residential and will not exceed 2.5 storeys or equivalent.
- C/13/0806 – East Anglia Offshore Wind Project and Galloper Wind Farm; Approved 17 June 2014. The underground cabling for this approved development will run through the site. However, due to it being underground it will not have any visual effect above or beyond that already described by the proposed development. It will also not alter any apparent functional link. Therefore no cumulative effect is predicted.

10.9 STATEMENT OF EFFECTS

10.9.1 The baseline survey identified 6 listed buildings which the proposed development has the potential to affect however it has been established that of those cultural heritage receptors only one, 1 Top Street will be affected by the proposed development. It has been demonstrated that the proposed development will have a negligible negative magnitude of effect on 1 Top Street.