

# Heritage Impact Assessment

## Proposed development of Land : South Saxmundham Garden Neighbourhood



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*Cover photograph 01 : View to south west from the north east corner of the site*

## **1.0 Introduction**

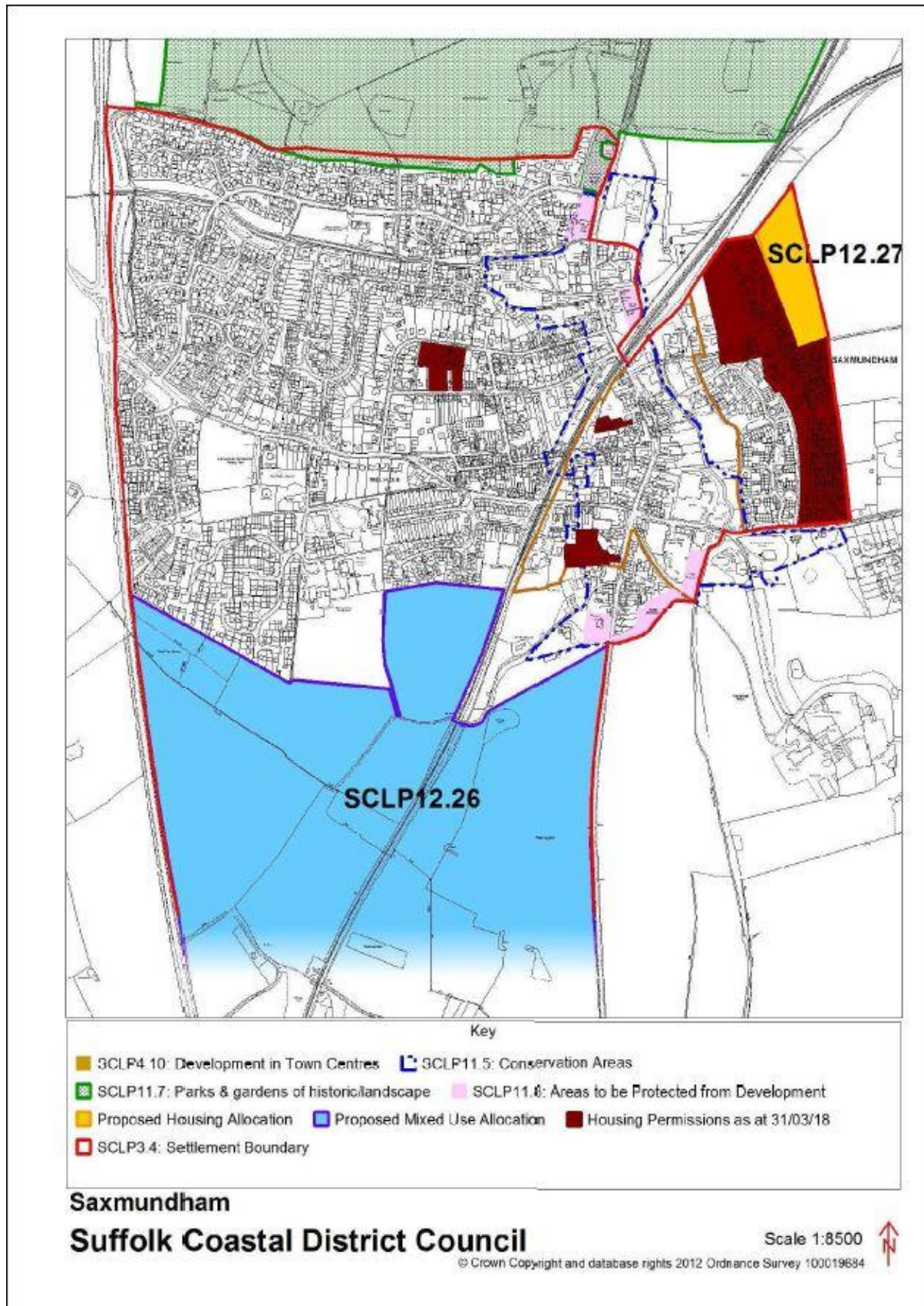
1.1 This report considers the impact of the proposed development of land to the south of Saxmundham, which is a proposed site allocation ref : SCLP12.26, referred to as South Saxmundham Garden Neighbourhood, within the first draft of the Suffolk Coastal Local Plan, July 2018. It identifies those heritage assets affected by the development, makes an assessment of their significance, including the contribution of setting and sets out the impact of the proposed development on their significance, including measures to be taken into consideration in designing the proposed scheme in order to minimise any harm to their significance.

1.2 It has been commissioned by Suffolk Coastal District Council following consultation on the first draft of the Local Plan, which includes proposed site allocations for new development. The Plan is now being reviewed to take account of responses to the initial consultation which identified the need for a Heritage Impact Assessment in order to justify the allocation and assess the impact of the proposed development on heritage assets.

1.3 The report has been prepared by David Edleston who is a member of the Royal Institute of British Architects and the Institute of Historic Building Conservation. He has over 30 years experience in dealing with design and development affecting the historic built environment in both the public and private sectors, including acting as an expert witness on cultural heritage at several major public inquiries; listed building casework; Conservation Area designation, character appraisals and enhancement schemes; preparation of design guidance and adoption as SPDs; Heritage Statements; Statements of Significance and Heritage Impact Assessments.

## **2.0 The Site and its Context**

2.1 The site, as proposed in the First Draft Local Plan, is approximately 44 hectares of land to the south of Saxmundham and includes land within the adjoining parish of Benhall. It adjoins the existing built development to the north and is bounded to the west by the A12 and to the east by the B1121. The southern boundary of the site is as yet undefined and the extent of development is intended to be informed by responses to the First Draft Local Plan consultation, although it is noted that coalescence between the parishes of Saxmundham and Benhall is to be avoided. The historic core of Saxmundham lies to the north east and is designated as a Conservation Area, with the southern boundary being adjacent to the site. The River Fromus lies to the east of the site within the former parkland landscape of Hurtshall Park. The railway line diagonally traverses the site running approximately north east to south west.

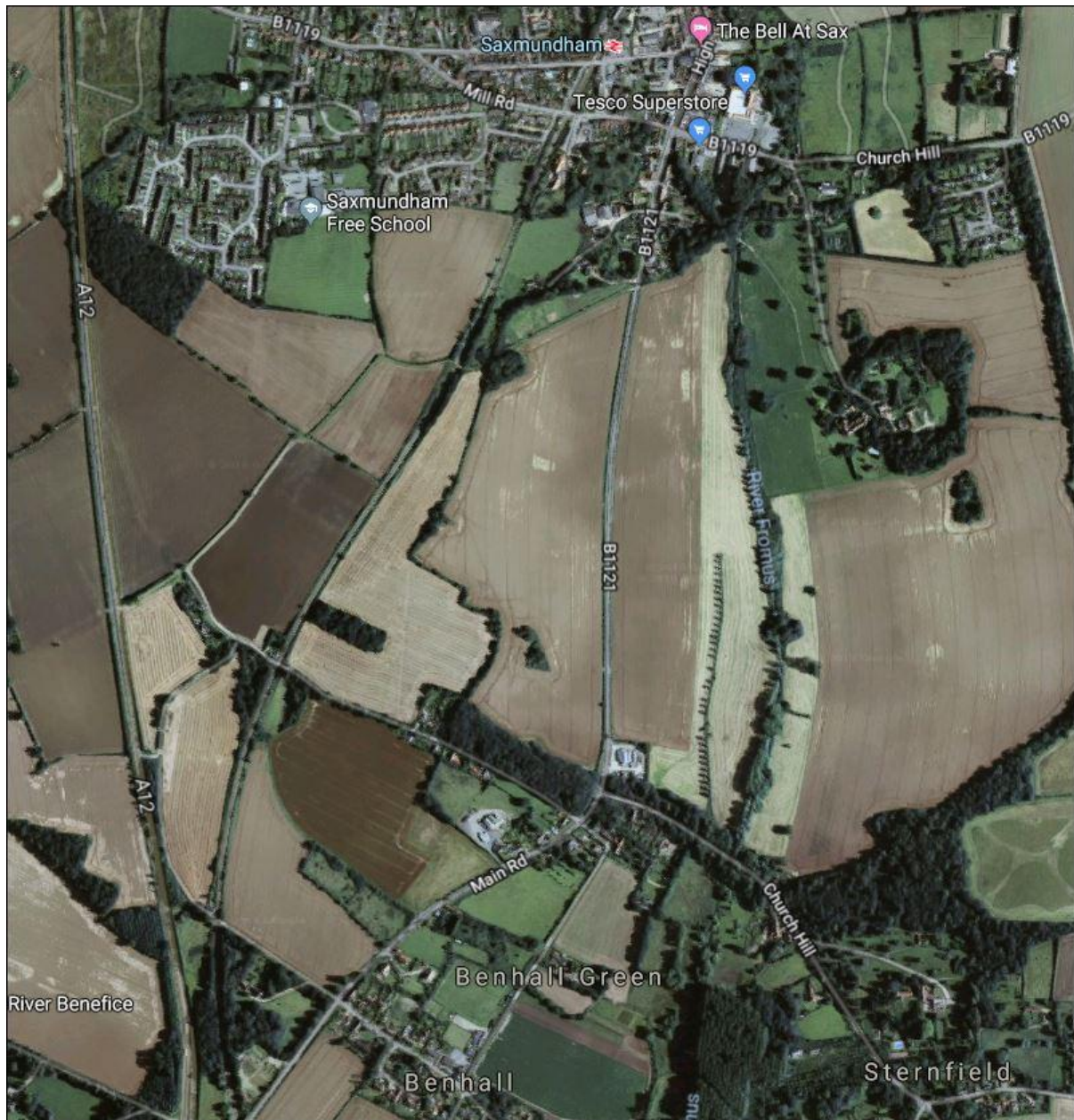


02 : First Draft Local Plan : Proposed site allocation SCLP12.26 for South Saxmundham Garden Neighbourhood

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2.2 The site lies partly within Landscape Character Area B4 : Fromus Valley and partly within O1 : Benhall Estate Farmlands, as identified in the Suffolk Coastal Landscape Character Assessment, July 2018. The Settlement Sensitivity Assessment, July 2018 for Saxmundham notes that the area to the east of the railway (SX2) is sensitive to change due to its rural character, valued views and historic associations, whilst the area to the west of the railway (SX3) is less sensitive to residential development if associated with woodland planting.



03 : Aerial view of the proposed site between the A12 to the west, the B1121 to the east and the existing built development to the north. The railway diagonally traverses the site. The River Fromus lies to the east along with remnant parkland of Hurtshall Park and Hurts Hall. Saxmundham Conservation Area and the Church of St John the Baptist are to the north east.

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*04 : View to north within the site**05 : View from the north east corner**06 : View to west from the B1121**07 : View to north alongside the B1121*

### **3.0 Proposed Development**

3.1 The proposed development is for the creation of the South Saxmundham Garden Neighbourhood. This is to provide new opportunities for housing, employment and community facilities, focused around the principles of an inclusive community, integrated with Saxmundham and the surrounding countryside by enhancing green infrastructure networks. Policy SCLP12.25 within the First Draft Local Plan sets out the Strategy for Saxmundham and Policy SCLP12.26 provides details for the development of the Garden Neighbourhood, which is to include approximately 800 dwellings, a new primary school, community facilities and employment land along with the provision of appropriate green infrastructure and open space.

3.2 An indicative masterplan has been drawn up to illustrate a possible layout for the Garden Neighbourhood focussed on the creation of neighbourhoods around green infrastructure. However, it is intended to refine the masterplan including the extent of proposed development to the south.



**Policy SCLP12.25: Strategy for Saxmundham**

Saxmundham will continue to be a thriving retail, employment and service centre, serving a key role in meeting the needs of its residents, surrounding rural communities and visitors, recognising the opportunities related to the connections offered by the rail and A12 transport corridors.

The strategy for Saxmundham is to:

- a) Enhance the vitality and vibrancy of the town centre, including through protecting and enhancing the historic core of the town;
- b) Utilise opportunities related to the presence of the railway and the proximity to the A12;
- c) Diversify and expanding employment opportunities;
- d) Enhance pedestrian and cycle connectivity around and beyond the town, particularly to the town centre and the railway station;
- e) Promote quality of life through enhancements to networks of green infrastructure; and
- f) Increase the provision of housing and affordable housing, and providing greater choice in the mix of housing available.

The creation of the South Saxmundham Garden Neighbourhood will provide new opportunities for housing, employment and community facilities, focused around the principles of an inclusive community and integration with Saxmundham and the surrounding countryside through enhancing green infrastructure networks.

**08 : First Draft Local Plan Policy SCLP12.25 : Strategy for Saxmundham****Policy SCLP12.26: South Saxmundham Garden Neighbourhood**

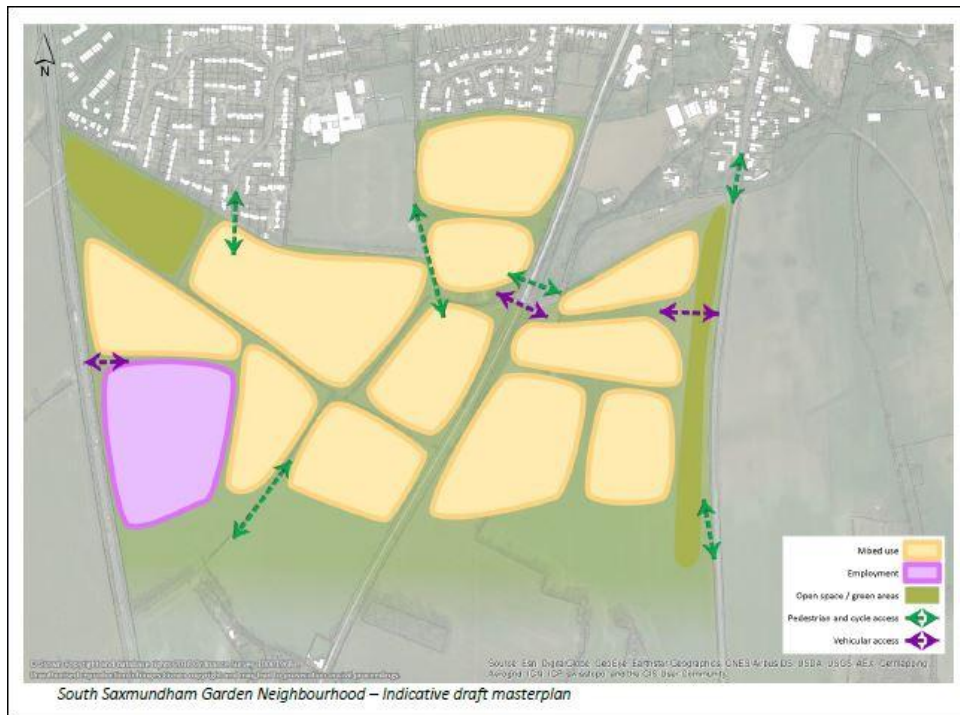
Approximately 44ha of land for a garden neighbourhood is identified to the south of Saxmundham, which includes land within the parish of Benhall, for an education led development, comprising primary school provision, community facilities and employment land alongside a variety of residential development. This new development will be delivered through a master plan approach brought forward through landowner collaboration and community engagement.

Critical to the success of this master plan will be the integration of the new garden neighbourhood with the existing community of Benhall and Saxmundham, as well as taking into account the location of the site.

The master plan should be informed by community engagement and include:

- a) Provision of a primary school with early years provision;
- b) Appropriate green infrastructure provision to provide accessible natural green space and retention and enhancement of the natural features on the site such as trees, woodland and hedgerows to be incorporated into the layout of the development;
- c) Appropriate open space provision for both informal and formal recreational opportunities;
- d) Public rights of way on the site should be preserved and enhanced;
- e) Biodiversity networks and habitats to be preserved and enhanced;
- f) Design and layout that supports a dementia friendly environment;
- g) Provision of new vehicular access points off the A12 and the B1121 supported by further access for pedestrian and cycle traffic in other locations;
- h) Employment land; and
- i) Approximately 800 dwellings of a range of types, sizes and tenures including housing to meet the needs of older people and younger people, and provision of self build plots.

**09 : First Draft Local Plan Policy SCLP12.26 : Criteria for development of the site**



10 : First Draft Local Plan Indicative Masterplan showing possible areas of mixed use development around green infrastructure, an employment area adjacent to the A12, areas of open/ green space to the northwest and along the B1121 and new vehicular access points off the A12 and B1121 along with pedestrian and cycle access in various locations.

## 4.0 Relevant Policies & Guidance

4.1 In relation to heritage assets the following policies and guidance are considered to be relevant when assessing the impact of the proposed development :

4.2 **National Planning Practice Guidance : Conserving & enhancing the historic environment** sets out the main legislative framework for planning and the historic environment and states : '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 (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan'.

4.3 **Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990** states 'In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or as the case may be, the Secretary of State, shall have regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.



**4.4 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990** imposes a general duty on local planning authorities in relation to the exercise of planning functions affecting Conservation Areas which requires special attention to be paid to the desirability of preserving or enhancing the character or appearance of that area.

**4.5 National Planning Policy Framework**, (revised July 2018), Section 16 :  
Conserving & enhancing the historic environment

**4.6 Historic England Guidance : Historic Environment Good Practice Advice in Planning : GPA2 'Managing Significance in Decision-Taking in the Historic Environment' July 2015 and GPA3 'The Setting of Heritage Assets' Dec 2017.**  
Guidance in GPA3 sets out a stepped approach to assessment :

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

## **5.0 Identification of heritage assets affected and their settings**

5.1 Step 1 of the Historic England Guidance 'The Setting of Heritage Assets', advises that the starting point of the analysis is to identify those heritage assets likely to be affected by the development proposal. The Suffolk Historic Environment Record and the National Heritage List for England have been consulted. A site visit was also undertaken on 11 October 2018 in order to assist with the identification of those heritage assets potentially affected by the proposed development and the assessment of their significance, including the contribution of setting and to view the proposed development site and its context. There are several non-designated, below ground archaeological areas identified on the Suffolk Historic Environment Record within and adjacent to the site. These have not been included within this assessment and it is recommended that specialist archaeological advice is sought if further assessment is required.

5.2 There are no designated heritage assets within the proposed development site. However there are several designated and non-designated heritage assets surrounding the site and the following are in close proximity :-

- **Church of St John the Baptist** : listed Grade II\*, the Church lies within the Conservation Area to the north east of the site.
- **Hurts Hall** : listed Grade II, the hall lies to the east of the site.
- **Saxmundham Conservation Area** : originally designated in 1970, extended in 1980 and re-designated in 1991. The Conservation Area adjoins the north-east corner of the site and includes the historic core of the town which has a considerable wealth of listed and other historic buildings.
- There are several Grade II listed buildings on the west side of South Entrance within the Conservation Area, which are also of group value. Those closest to the site include **Crown House, 30 South Entrance; The White House, 28 South Entrance** and **Monks Cottages, 22, 24 & 26 South Entrance**. Other listed buildings (all Grade II), include nos **16, 12 (Ivy House), 10 (Beech Lawn House) and 4 (Priory House) South Entrance**.
- The majority of the unlisted buildings on the east and west side of South Entrance are identified in the Saxmundham Conservation Area Appraisal as making a positive contribution to the character and appearance of the area. These include nos **49 and 51, 47, 45 (Holly House), 29 to 35, 27, 11 to 15, and 5 to 9** on the east side, along with nos **34, 32 (Park Cottage), 20 (Pine Villa), 18, 6 and 2** on the west side of **South Entrance**.
- To the south east of the site are two Grade II listed buildings within the Parish of Benhall : **The Limes, Benhall Main Road** and **Garden Cottage, Bigsby's Corner**.
- A further group of Grade II listed buildings are located to the south of the site also within the Parish of Benhall, including **Benhall Cottage, Benhall Stores, 5 & 6 Benhall Green, BayTree Cottage, 7 & 8 Benhall Green and Lime Tree House**.

5.3 In identifying the extent of setting of each of the heritage assets noted above, The Limes, Benhall Main Road and Garden Cottage, Bigsby's Corner cannot be appreciated in views from or including the proposed development site. In addition the site is not visible from either of these heritage assets and it is not therefore considered to fall within their settings. In relation to the other group of listed buildings within the Parish of Benhall to the south of site, with the exception of Benhall Stores, similar principles apply and the proposed development site does not lie within their settings.

5.4 There are views both from within and across the proposed development site of the Church of St John the Baptist, Hurts Hall and Saxmundham Conservation Area, including buildings on South Entrance and there are views towards the site from

Hurts Hall and the Conservation Area. There is also a degree of intervisibility between all of these heritage assets. There are views of Benhall Stores from within and including the existing open area of land adjacent to the north side of the Benhall Main Road and Grays Lane junction. There are also views towards this land from the Benhall Stores. The proposed development will therefore affect the setting of the Church of St John, Hurts Hall, Saxmundham Conservation Area. Should any development extend as far south as Grays Lane, the setting of Benhall Stores will also be affected.



11 : Designated heritage assets : location of listed buildings

© Google Maps



## 6.0 Assessment of significance and the contribution of settings

6.1 Step 2 of the Historic England Guidance 'The Setting of Heritage Assets', is to assess whether the setting of a heritage asset makes a contribution to its significance and the extent and/or nature of that contribution. This should initially address the key attributes of the heritage asset itself and then consider :

- the physical surroundings of the asset, including its relationship with other heritage assets
- the way the asset is appreciated
- the asset's associations and patterns of use

6.2 'Significance' is defined in the NPPF glossary as *'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'*

6.3 'Setting' is also defined in the NPPF glossary 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. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'*.

6.4 The significance of each of the heritage assets identified will therefore be considered initially followed by an assessment of their settings and how this contributes to their significance.

6.5 **Church of St John the Baptist** : As a high status, Grade II\* listed building, its significance is derived from its considerable architectural, historic, archaeological and artistic interest. It is the oldest recorded building in Saxmundham and is mentioned in the Domesday Survey of 1086 and the founding of the church is thought to have been funded by wealth generated through the wool industry. Fabric from the 13th century survives in the chancel, from the early 14th century in the tower and from the 15th century in the clerestory, the nave hammerbeam roof and font, making an important contribution to the significance of the building. The church is built of flint and conglomerate with ashlar quoins, along with lead and slate roofs. Much rebuilding and restoration work was carried out in the 19th century with the north aisle being added in 1851 and extended westwards and the south aisle extended in 1872-3, when the church was transformed and the mediaeval porch and arch removed. A north vestry was added during the early part of the 21st century. The church has several important local historic associations, having several 19th century tablets and monuments, including those of the Long family of Hurts Hall, with

a memorial to Charles Long by the renowned sculptor Joseph Nollekens, amongst others. The church has an imposing presence over the town as a landmark building, making an important contribution to locally distinctive character and creating a strong sense of place. As the principal building within the Parish of Saxmundham, it has considerable communal value as the spiritual focus of community life for many centuries as well as being a key part of the traditional rural scene.



*12 : View to north west across churchyard*



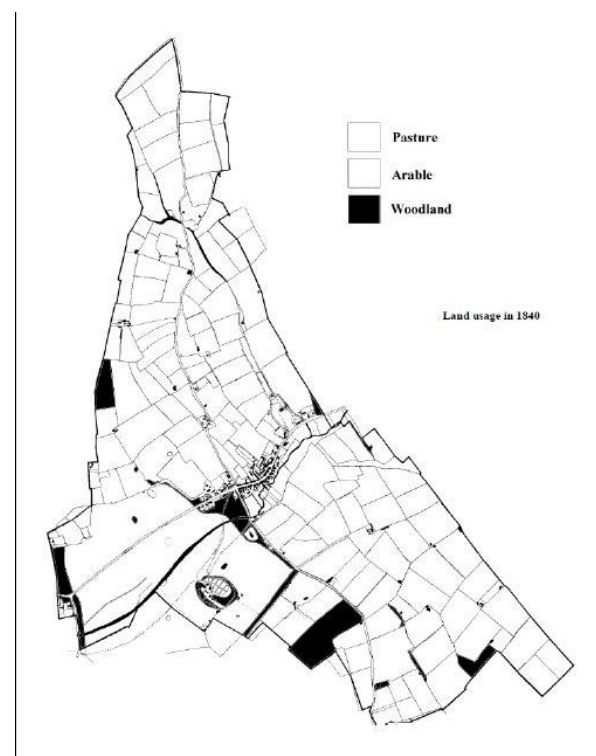
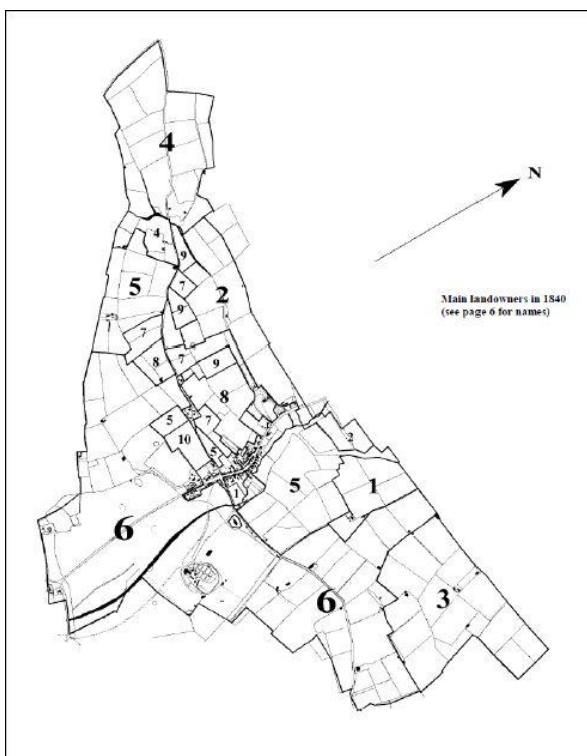
*13 : View to north east*

**6.6 Hurts Hall** : The original building designed by Samuel Wyatt in 1803 was destroyed by fire in 1889 and replaced by the present building in 1893 by the Ipswich architect T W Cotman. Built for the Long family and set in the extensive parkland landscape of Hurtshall Park, it is of considerable architectural and historic interest. Reference to the Tithe map of 1840 shows that a large area of land to the south of Saxmundham was in the ownership of the Long family including that to the west of the Hall and the area known as The Layers. The original house was built in a classical style, but the replacement as seen today was designed in a Jacobethan style with the principal rooms facing south and south west with the architectural details reflecting this. Built in red brick with diaper patterning and ashlar dressings,

key features include octagonal brick chimney stacks, gabled projections, two storey polygonal bay, canted bays, crenellated parapet and a 4 bay stone loggia supported on Corinthian columns with balustrading. The building occupies a prominent position in the landscape and its architectural character and historic associations with the Long family who owned the hall until 1957, make an important contribution to its significance. The patronage and architectural legacy of the Long family can still be seen in the town, with the town pump and Market Hall having both been funded by the family and the latter incorporating the Long coat of arms over the main entrance.



14 & 15 : Views of Hurts Hall looking to the east and south east from the B1121



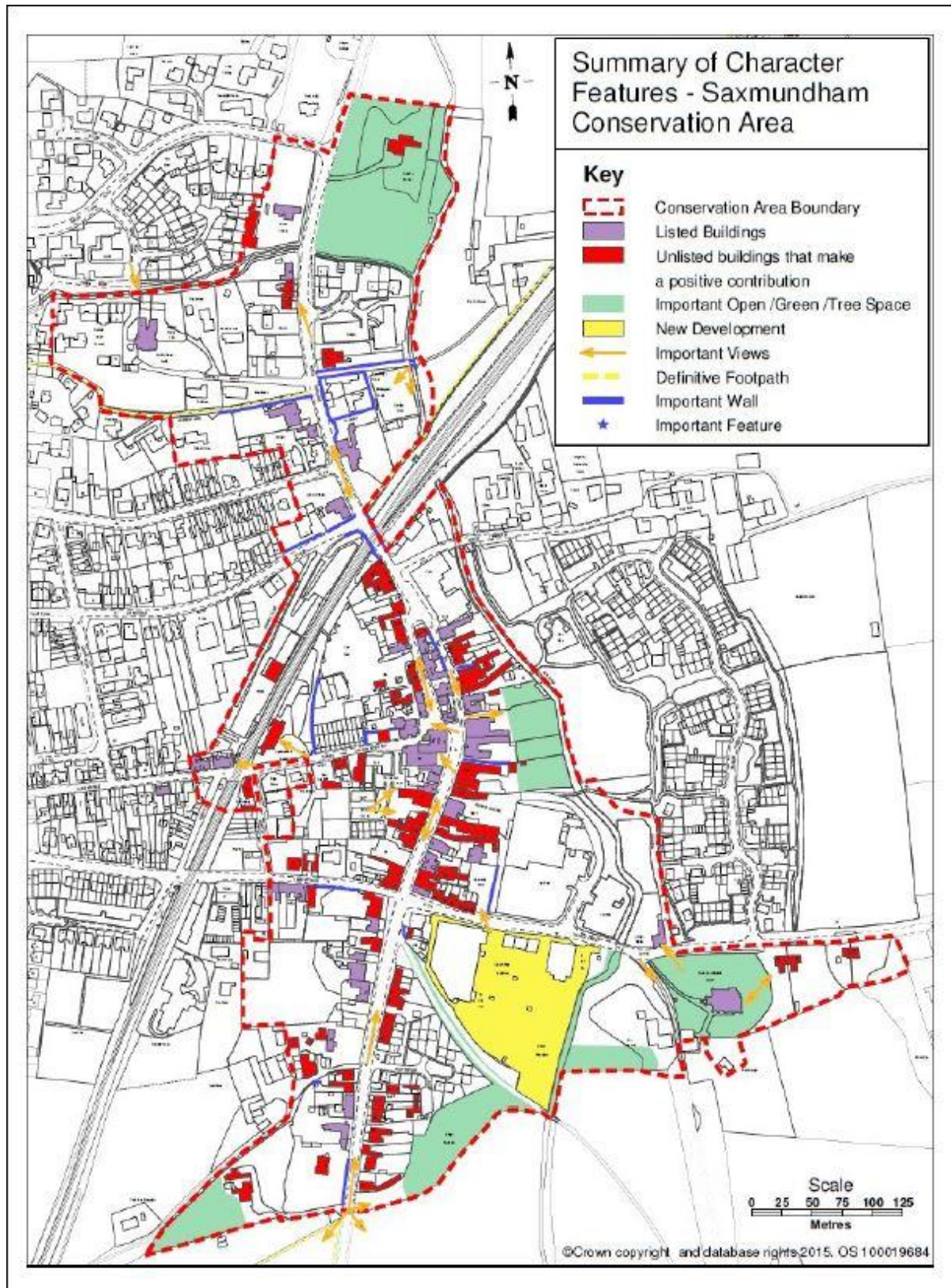
16 & 17 : Map extracts from 'Saxmundham in the 1840s' show that William Long owned 445 acres of land (and Hurts Hall) to the south of Saxmundham (no 6 on map), which is part of the proposed development site. The land use map also shows that in 1840 the proposed development site was in agricultural use, as it still is today.



**6.7 Saxmundham Conservation Area** : Designated in 1970, the Conservation Area was extended in 1980 and re-designated in 1991. The Conservation Area adjoins the north-east corner of the site and includes the historic core of the town which has a considerable wealth of listed and other historic buildings. The Conservation Area Appraisal adopted in March 2016 notes that the overall character is one of a reasonably well-preserved historic Suffolk market town of picturesque and attractive appearance. The linear pattern of development along the line of the old turnpike road through the historic town makes an important contribution to the significance of the area, running from South Entrance through High Street and then on to North Entrance. The historic Market Place forms the heart of the town with those buildings abutting High Street generally being the most high status. Buildings within the town centre are largely commercial, often with domestic accommodation above, whereas in the northern and southern ends of the Conservation Area, as well as the tributary roads to the east and west, domestic properties are found. Closer to the Market Place, buildings are generally of 16th, 17th and 18th century date, whereas to the north and south of the area properties from the 18th and 19th centuries are set in private gardens and landscapes. In South Entrance most of the buildings are older properties which contribute greatly to the architectural and historic character of the town. The Conservation Area Appraisal notes in particular the abrupt change in character between the open countryside and the town when crossing the Conservation Area boundary at South Entrance, with the buildings being screened initially by trees and a key characteristic being the strong sense of enclosure created with the majority of buildings located fairly close to the road. The Conservation Area Appraisal also identifies an important green/tree/open space along the southern edge of the area which contributes to its significance.



*18 & 19 : Entrance into the Conservation Area from the south and linear pattern of development and strong sense of enclosure from buildings along South Entrance and High Street.*



20 : Saxmundham Conservation Area showing the Church, listed buildings and other non listed buildings on South Entrance which make a positive contribution to the character and appearance of the area. © Suffolk Coastal District Council



**6.8 Listed Buildings, South Entrance** : There are several Grade II listed buildings within the Conservation Area on the west side of South Entrance, close to the southern boundary. Their significance is derived from the architectural and historic interest of each individual building, but collectively they also make a positive contribution to the character and appearance of the Conservation Area as an important group. Some are slightly set back from the road with small front gardens, whereas others are close to the edge of the footway and create a strong degree of enclosure to the street. Crown House dates from the early 19th century and is a painted brick building with a shallow pitched and hipped slated roof and a central ridge chimney stack of red brick. It has a well proportioned symmetrical facade of five sash windows surrounding a central panelled door and timber doorcase. The White House adjoins with a lower eaves and steeper pitched slated roof and an off centre ridge stack. The late 18th century painted brick facade has a dentil eaves cornice, 8 over 8 pane sashes and an off centre panelled door with a pedimented doorcase and a blind widow directly above. Monks Cottages, a row of three houses abutting the footpath date from the early 18th century. They are timber framed and rendered with steeply pitched plain tiled roofs, the roof of no 26 being higher, and brick stacks. Each house has a six-panelled door with timber doorcases and the windows are 18th century metal casements, some with square leaded lights. No 22 has panelled pargetting in a chequered pattern.



*21 : No 30 Crown House*



*22 : No 28 The White House*



*23 : Nos 22, 24 & 26 Monks Cottages*



*24 : Group of buildings on west side*



**6.9 Other buildings, South Entrance** : Although none of the buildings on the east side of South Entrance are listed, the majority are identified in the Conservation Area Appraisal as making a positive contribution to the character and appearance of the area. The buildings are generally tightly grouped, dating primarily from the late 18th and 19th centuries and are either pairs or rows of cottages, located close to the street. Closest to the southern boundary of the Conservation Area is no 49 & 51, a detached, early 19th century two storey structure with a single storey canted bay to the front elevation. No 47 is set back slightly from the road and is a double fronted mid 19th century building. The three bay wide principal facade is framed by a pair of two storey canted bay windows. The shallow pitched roof is slated and the brick elevation is painted. Sash windows have margin lights and there is an attractive iron lattice porch to the entrance. Holly House (no 45) dates from the early 19th century and is an attractive red brick building of three bays width which abuts the footpath. It has a pedimented doorcase and 6 over 6 pane sashes. Nos 41 to 43 are a row of late 18th or early 19th century red brick cottages, possibly built as three cottages, with no 43 (Crown Cottage) having a projecting timber shop front window. Nos 29 to 35 are an early 19th century row of attractive gault brick cottages, all retaining their 8 over 8 pane sash windows, small front gardens and black glazed pantile roofs, thereby making an important contribution to the Conservation Area.



*25 : No 49 & 51 South Entrance*



*26 : No 47 South Entrance*



*27 : No 45 Holly House*



*28 : Nos 29 to 35 South Entrance*

**6.10 Benhall Stores, Main Road Benhall** : As the former 'Horse and Groom' public house until the mid 19th century, followed by use as a shop prior to becoming a dwelling, Benhall Stores is of considerable historic interest having played an important role in the local community. Architecturally its significance is derived principally from its timber framed structure dating from the late 17th or early 18th century, with the facade being plastered in panels, having a coved cornice, plain tiled roof and casement windows.



*29 & 30 : Benhall Stores looking to south west & north east © Google Street View*

**6.11** Having considered the significance of the heritage assets affected, the Historic England Guidance on 'The Setting of Heritage Assets', provides a checklist of potential attributes of a setting to assist with assessing the extent that setting contributes to significance. It is necessary to consider the physical surroundings of the assets and the way in which they are appreciated. It is also important to note that setting is dynamic and the relationship between an asset and its surroundings changes as one moves around. The attributes of the setting of the heritage assets identified in relation to their physical surroundings include : other heritage assets; land use; green space, trees and vegetation; openness, enclosure and boundaries; history and degree of change over time. Key elements in relation to experience of the assets include the surrounding landscape character; views from, towards, across and including the assets; associative relationships between heritage assets.

**6.12 Setting of Church of St John the Baptist, Saxmundham** : The Conservation Area Appraisal identifies a number of important views towards the church and from the surrounding churchyard. There are views of the church when travelling up Church Hill where the tower can be intermittently seen through the trees. However, these are relatively short, close up views and the ability to experience the church in this setting is in some cases restricted by surrounding trees and vegetation and is subject to seasonal variations and the specific viewpoint. The church stands in an elevated position on higher ground to the east of the town with open land to the south enabling it to be seen in wider views, with the tower in particular being visible as a built feature on the skyline behind the surrounding trees. This open landscape



which includes the remnants of Hurtshall Park and agricultural land beyond, forms the setting of the church in views from the south and south west including the B1121 and The Layers in the eastern part of the proposed development site. Although historic maps illustrate a number of changes over time to the parkland landscape, the church has a long-standing relationship with this surrounding land which is subject to seasonal changes in character and the ability to experience the church in this open, rural setting makes an important contribution to its significance.



*31-33 : Setting of the church viewed from the south west. The ability to experience the church in this open, rural setting is subject to seasonal variations. The tower is seen as a key built feature on the horizon behind the trees in an open rural landscape.*



**6.13 Setting of Hurts Hall, Saxmundham :** In the 1840s, the original Hurts Hall was described as ' *a large white brick mansion lying in a well wooded park of around 200 acres*'. The land use map of 1840 shows that woodland surrounded the Hall at that time ensuring that it was private in relation to its outlook and overlooking. This is quite different to the park as exists today particularly in terms of tree cover. Reference to early editions of the OS Maps reveals that Hurtshall Park was quite extensive, extending down to the River Fromus and that areas of open land beyond the more immediate, formal parkland, formed part of the extended setting in views from the Hall. This included The Layers to the west, which was also in the ownership of the Long family, and along with its tree screening to the north, west and south boundaries which continued as far south as the woodland on the north side of Kiln Lane, formed the extended setting of the Hall. This land was in agricultural use in 1840 as illustrated on the maps in figures 16 & 17, which confirms the historic relationship between the Hall and its extended landscape setting. This area of agricultural land is also of some cultural significance in relation to the historic function of the market town, having been used as a holding area for livestock on market days. Today the land which forms the extended setting remains in agricultural use and as such is subject to seasonal changes in appearance. Key views of the Hall are from the west including from within the proposed development site and from the B1121. There are also views from Hurts Hall looking to the west, which includes views of the proposed development site. Despite changes to the formal parkland over time, particularly the extent of tree cover around the Hall, it is the open and rural character of the surrounding parkland and agricultural land which forms its extended setting and makes an important contribution to its significance,



*34, 35 & 36 : Setting of Hurts Hall seen in views to the east from the B1121. Although the parkland and extent of tree cover has altered over time the ability to experience the Hall in this open rural landscape is a key element of its setting making an important contribution to its significance.*

**6.14 Setting of Saxmundham Conservation Area :** The Conservation Area Appraisal notes that the setting of the area is much enhanced by private parks, with Hurts Hall to South Entrance providing expansive, attractive, rural character before entering the density of the town. Recent residential development east of the River Fromus off Church Hill means that the open countryside, that was formerly on the eastern bank of the river and formed the setting to the Conservation Area is now more distant. The cumulative impact of large scale residential development to the west over time, has also eroded the relationship between the historic core and open countryside. As a consequence, the remaining rural setting and relationship with the surrounding landscape to the south of the Conservation Area is all the more important. There is a distinct contrast between the more urban, built up character within the Conservation Area, with buildings forming a strong sense of enclosure to the street and the open, green, rural character which is immediately experienced when crossing the Conservation Area boundary at South Entrance. This abrupt change from rural to urban, creates an important gateway and sense of arrival on the approach to the town from the south. The Conservation Area Appraisal identifies important views to the north and south from this point with those to the south and towards the proposed development site comprising open spaces with trees and hedgerows making an important contribution. The agricultural use of the land to the south means that there are also seasonal changes in its character and appearance.



*37, 38 & 39 : Approach to the Conservation Area along the B1121, where the open, rural landscape forms its setting and makes an important contribution to its significance. There is a distinct change in character from rural to more urban on arrival at South Entrance which forms a gateway entrance to the area.*





*40 & 41 : Contrast between the urban, built up character of the Conservation Area and the abrupt change to an open, rural character of the immediate surrounding landscape which forms its setting from the south.*

**6.15 Setting of buildings on South Entrance, Saxmundham :** Within the Conservation Area, the setting of the listed buildings on the west side of South Entrance along with other non-designated heritage assets on both sides of the street is urban in character and is formed by their relationship with the street and with one another as an important group. However, the setting of those buildings towards the southern end of the Conservation Area including the Grade II listed Crown House, The White House and Monks Cottages along with the unlisted building on the east side is defined by the open, rural area, which is experienced as the backdrop in views to the south and as the foreground in views to the north.



*42 - 45 : Open rural area to the south as the setting of buildings on South Entrance*



46 : View to the north with the rural character forming the setting in the foreground

#### 6.16 Visual relationship between the Church, Hurts Hall and the Conservation Area

In addition to the important historic and cultural relationships between the Church, Hurts Hall and other buildings within the Conservation Area because of the association with the Long family as previously noted, there are also important visual connections between these three heritage assets. Within the open landscape to the south of Saxmundham, there are panoramic views when travelling along the B1121 and from within the proposed development site, particularly from The Layers, where the Church of St John the Baptist, Hurts Hall and the roofscape of the concentration of buildings within the Conservation Area can all be seen in the same view. This visual inter-relationship between these buildings and the ability to experience them collectively in the open, rural landscape to the east and west of the B1121, is a key part of their settings contributing greatly to their significance.







*47 - 49 : Views to the north and east from the B1121 where Hurts Hall, the Church of St John the Baptist, buildings within the Conservation Area and the proposed development site can be seen together in an open, green and rural landscape setting.*



**6.17 Setting of Benhall Stores, Benhall** : Benhall Stores, formerly a public house and now a dwelling occupies a prominent position on Main Road at the junction with Forge Close and Grays Lane. There are views from the north west across open agricultural land towards the building as well as views from the building towards this area. There will be seasonal changes in the appearance of this surrounding land arising from its agricultural use. However, evidence from historic maps shows that this use and open character has changed little over time and the rural setting in which the building is experienced contributes to its overall significance.



*50 : View looking to south west along the B1121 showing the open, agricultural land to the north west forming the setting of Benhall Stores. © Google Street View*

6.18 The character of the landscape which surrounds the Church of St John the Baptist, Hurts Hall and the Conservation Area is an important element contributing positively to the way in which they are experienced, especially in relation to key views, the sense of openness, trees and vegetation, seasonal changes in appearance and the visual relationship with one another. In a similar manner, the open landscape surrounding Benhall Stores makes a key contribution to the way that the building is experienced. Those aspects of the setting of each of these heritage assets identified and described above are therefore considered to make an important contribution to their significance.

## **7.0 Impact assessment of proposed development**

7.1 Step 3 of the Historic England Guidance 'The Setting of Heritage Assets' is to identify the range of effects a development may have on setting and evaluate the resultant degree of harm or benefit to the significance of the heritage assets. Step 4 of the guidance is to consider the way that the development has been designed in

order to maximise enhancement and minimise harm. These two stages will be considered together in order to evaluate the overall impact of the proposed development. Using the checklist for assessing the effect of the proposed development, the following elements are considered to be relevant :-

- Location and siting : proximity to asset; extent of development; position in relation to landform and key views
- Form and appearance : prominence, dominance, or conspicuousness; competition with or distraction from the asset; dimensions, scale and massing
- Other effects : change to built surroundings and spaces; change to skyline; changes to general character

7.2 With regard to the assessment of impact, Paragraph 193 of the NPPF (2018) states :-

*'When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'*

7.3 Paragraph 194 goes on to say :-

*'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of :*

*a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*

*b) assets of the highest significance, notably .....grade I and II\* listed buildings.....should be wholly exceptional.'*

7.4 Where a degree of harm is identified as a result of new development, Paragraph 195 states :-

*'Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply :-*

- a) the nature of the heritage asset prevents all reasonable uses of the site; and*

*b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*

*c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*

*d) the harm or loss is outweighed by the benefit of bringing the site back into use.'*

7.5 Paragraph 196 states :-

*'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.'*

7.6 Paragraph 200 states :-

*'Local planning authorities should look for opportunities for new development within Conservation Areas....., and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'*

7.7 The assessment undertaken above shows that development of the site has the potential to impact on the setting of the following heritage assets :-

- **Church of St John the Baptist, Saxmundham** : Grade II\* listed building
- **Hurts Hall, Saxmundham** : Grade II listed building
- **Saxmundham Conservation Area**
- **Crown House, The White House & Monks Cottages** : Grade II listed buildings within the Conservation Area
- Other unlisted buildings (non-designated heritage assets) to the east and west side of South Entrance within the Conservation Area
- **Benhall Stores, Benhall** : Grade II listed building

This assessment concludes that the setting of these heritage assets makes an important contribution to their significance. It also notes in particular a number of key aspects of their setting including the importance of the open, rural landscape which still remains to the south and west of the Church, Hurts Hall and the Conservation Area; the contribution of the church tower and the hall as key features in views across the landscape and the ability to appreciate all of the heritage assets in the panoramic view from the south including from within the proposed development site.



7.8 The Settlement Sensitivity Assessment for Saxmundham concludes as follows in relation to the area to the south (SX2) :- *'The sensitivity of this area lies in its pronounced valley slopes which define the setting and approach to Saxmundham from the south. To the east is an area of remnant parkland while to the west is agricultural land known as The Layers which has historically been a holding area for livestock on market days and is culturally significant to the town. This approach to the town is defining both in terms of character, sense of arrival and position in the valley landscape. This area is sensitive to change due to its rural character, valued views and historic associations'*. The area adjoins the southern boundary of the town and extends from the railway in the west to beyond the boundary of Hurtshall Park in the east and includes the eastern part of the proposed development site.

7.9 The Indicative masterplan included within the First Draft Local Plan illustrates areas of mixed use development over the whole area of the eastern part of the site between the railway and the B1121 with a narrow strip of open/green space running north south on the west side of the road. A new vehicular access point is also proposed into the site at the northern end of the B1121, close to the boundary with the Conservation Area.

7.10 Paragraph 12.204 within the First Draft Local Plan states :- *'From the south. Saxmundham is primarily accessed by the B1121 South Entrance. This provides an historic entrance to the town which could be enhanced as part of the masterplan. The buildings found at South Entrance have an historic character and are within the Conservation Area. Any future development in this area needs to be sympathetic to the character and setting of this area'*.

7.11 The open, rural and undeveloped character of the land within the proposed development site which lies to the east of the railway, makes an important contribution to the setting of the Church, Hurts Hall, the Conservation Area and several buildings within the area, where they are all experienced in panoramic views which have remained relatively unchanged for many years. As the only undeveloped area of land adjoining the Conservation Area it has an important role in retaining the historic relationship between the rural setting and urban character of the town. Development will also affect important views in and out of the Conservation Area, views to and from the Church and views to and from Hurts Hall. Development within this area will therefore have a harmful impact on the significance of these heritage assets and in terms of the National Planning Policy Framework, is considered to be less than substantial harm. However, taking into account the cumulative impact on several heritage assets, including the high status Grade II\* listed Church, the harm will be at a relatively high level.

7.12 The indicative layout illustrated on the masterplan fails to take account of historic field patterns within the area and in particular, the tree belt to the boundaries of The Layers especially that on the western boundary. Although an area of

open/green space is illustrated along the boundary of the B1121 with any built development slightly set back into the site, it is not considered that this will be sufficient to screen any development on the approach to the town, particularly taking into account the undulating topography of the landscape. Development in the form indicated, including the creation of a new vehicular access point in close proximity to the Conservation Area boundary is therefore considered to have a harmful impact on the significance of the area and views in and out of the Conservation Area.

7.13 The relationship between the more urban built form of the town and the open, rural character of land to the south creates a strong sense of arrival, particularly given the abruptness of the change at the boundary of the Conservation Area. Any future enhancement of this area as described in the Draft Local Plan as part of the masterplan approach, has the potential to cause harm to this relationship and the setting of the Conservation Area and buildings on South Entrance.

7.14 As the setting of these designated heritage assets includes farmed, agricultural land, change of use to residential will result in the loss of seasonal character, which will also be the case with any open space incorporated into an urban design masterplan.

7.15 Although the extent of the proposed development site to the south has not yet been defined, it should be noted that the setting of Benhall Stores includes areas of open agricultural land to the north west, which has changed little over time and makes an important contribution to its significance. Any development which extends as far south as Grays Lane and includes this area of open land therefore has the potential to cause some degree of harm.

## **8.0 Conclusions and Recommendations**

8.1 The proposed development site falls within the setting of the Church of St John the Baptist, a Grade II\* listed building; Hurts Hall, a Grade II listed building; Saxmundham Conservation Area; Crown House, The White House & Monks Cottages, Grade II listed buildings within the Conservation Area and other non-designated heritage assets on the east and west sides of South Entrance within the Conservation Area. Should any development extend as far south as Grays Lane, the site will also fall within the setting of Benhall Stores, a Grade II listed building. As described in Section 6.0 of this report, the setting of each of these heritage assets, particularly the strong sense of openness and rural character of the surrounding landscape, makes an important contribution to their significance.

8.2 Development of the eastern part of the site will have a harmful impact on the significance of the Church, Hurts Hall, the Conservation Area and a number of listed buildings and other non-designated heritage assets on South Entrance for the

reasons set out above. Although this harm is considered to be less than substantial, given the cumulative impact on several heritage assets, the harm will be at a relatively high level.

8.3 There is potential for development to cause some degree of harm to the significance of Benhall Stores, should the site extend as far south as Grays Lane.

8.4 The eastern part of the site makes an important contribution to the open, rural setting of the heritage assets identified. The principle of development of this part of the site is therefore of concern and could not be supported because of the fundamental change in character from the present open, rural landscape, which would in itself cause an unacceptable level of harm. It is therefore recommended that any form of built development should be excluded from the whole area of land to the south of the Conservation Area, between the tree belt running approximately north south which forms the western boundary of The Layers and the B1121 in the east and down to the woodland on the north side of Kiln Lane. The tree belt runs roughly along the ridge line of the higher land to the west and forms a part of the historic field pattern as well as defining the extended landscape setting of Hurts Hall to the west. Any recreational or other use of the land including landscape enhancements, should ensure that the existing open character is retained, although careful consideration should be given to the concerns noted in paragraph 7.14 above, regarding the loss of seasonal character arising from change of use of the land. It is also recommended that consideration should be given to restricting the height of any development on the land between the tree belt and the railway line, together with reinforcement of the tree belt where necessary in order to minimise the visual impact and maintain the open, rural character of the eastern part of the site.

8.5 It is recommended that any enhancement of the South Entrance gateway into the Conservation Area should be restricted to reinforcement of the green edge only, to maintain the balance between urban and rural character and any new built development should be avoided.

8.6 A revised indicative masterplan should be prepared to take account of the conclusions and recommendations of the assessment.

8.7 Any development further to the south within land forming the setting of Benhall Stores should include sufficient open space to retain an appropriate setting for the building and to minimise any harmful impact.



## Appendix A : Statutory list descriptions

### Church of St John the Baptist, Saxmundham



*Church of St John the Baptist from the south west*

List entry number : 1268184

Grade : II\*

Date first listed : 18 July 1949

Date of most recent amendment : 25 September 1996

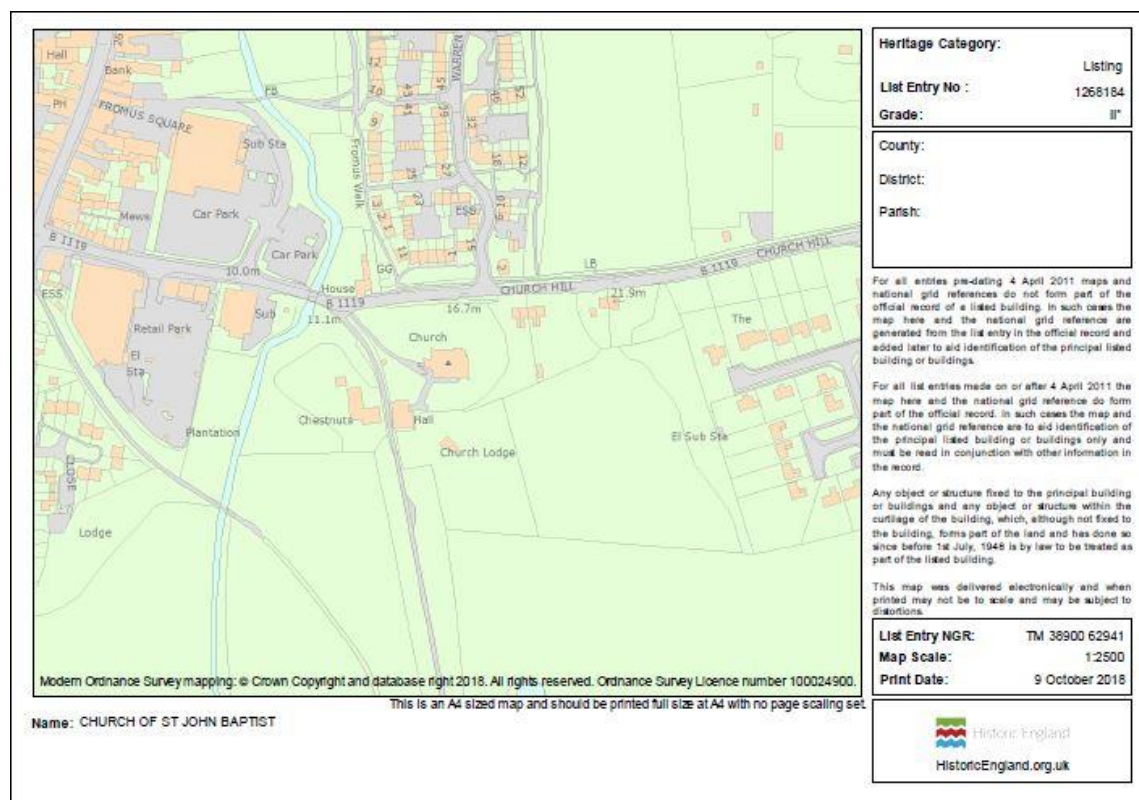
TM3862 CHURCH STREET 841-1/4/6 (South side) 18/07/49 Church of St John the Baptist (Formerly Listed as : SAXMUNDHAM CHURCH LANE Church of St John the Baptist) II\*

Parish Church. C14 west tower: south chapel at east end of south aisle 1308 for Robert Swann, restored 1948: north aisle rebuilt 1853 by Henry Roberts: restoration 1872-73 by RM Phipson including rebuilding of south aisle, removal of south porch and partial reconstruction of chancel: north transeptal vestry added 1907-08 by Brown & Burgess of Ipswich. MATERIALS: flint and conglomerate with ashlar quoins. Aisle roofs lead, otherwise slate. EXTERIOR: 3-stage tower supported by diagonal west buttresses. Arched west door below 2-light Y-traceried window with C15 stained glass in vesica head. Trefoil niche above. Cusped 2-light belfry openings. Flushwork crenellated parapet with square corner pinnacles. South aisle with 3-light Perpendicular windows under depressed arches, one to west end and three to south flank. To east of these serving Swann chapel is one 2-light cusped Y-tracery window. Four 2-light Perpendicular north aisle windows. Six 2-light restored Perpendicular

clerestory windows to north and south, the western two on south side with flushwork panelling and inscriptions. Gabled north vestry lit through one 2-light north window. 4-light Dec chancel east window of C19; C19 3-light south chapel east window in Perpendicular style. INTERIOR: 4-bay arcade on octagonal piers with polygonal capitals and triple-chamfered arches. Chancel arch with polygonal responds under double-hollow-chamfered arch. Eastern clerestory windows with moulded jambs, to the north on crenellated sills, to the south with black-letter inscription: 'Sanct Johannes, ora pro Nobis'. Restored late C15 hammerbeam nave roof supported on moulded wall posts resting on cobels in form of singing angels. Crenellated hammerbeams and collars, the later above arched braces. Arch-braced aisle roofs, to the north entirely C19, the south early C16, with pierced spandrels. 2-bay C19 arcade between south chapel and chancel. FITTINGS: octagonal C15 font with wild men and lions against the stem; angels bearing shields and lions alternate against the bowl. Cinquefoiled early C15 piscina in south chapel. MONUMENTS: various C19 tablets and monuments to Long family of Hurts Hall including tablet to Charles Long, d.1812, by Nollekins; weeping winged cherub with extinguished torch before an obelisk (chancel north wall). Monument to Charles Long, Baron Farnborough, d.1838, by Sir Richard Westmacott, a tablet with a profile bust (chancel north wall). (Brown C: Dictionary of Architects of Suffolk Buildings 1800-1914: Ipswich: 1991-; BOE: Pevsner N & Radcliffe E: Suffolk, 2nd Edition: Hammondsworth: 1974-: 412).



*View from south east across the churchyard*



Location Plan : Church of St John the Baptist, Saxmundham © Historic England

## Hurts Hall, Hurtshall Park, Saxmundham

List entry number : 1268178 Grade : II

Date first listed : 25 September 1996

SAXMUNDHAM TM3862 HURTSHALL PARK 841-1/4/47 Hurts Hall II

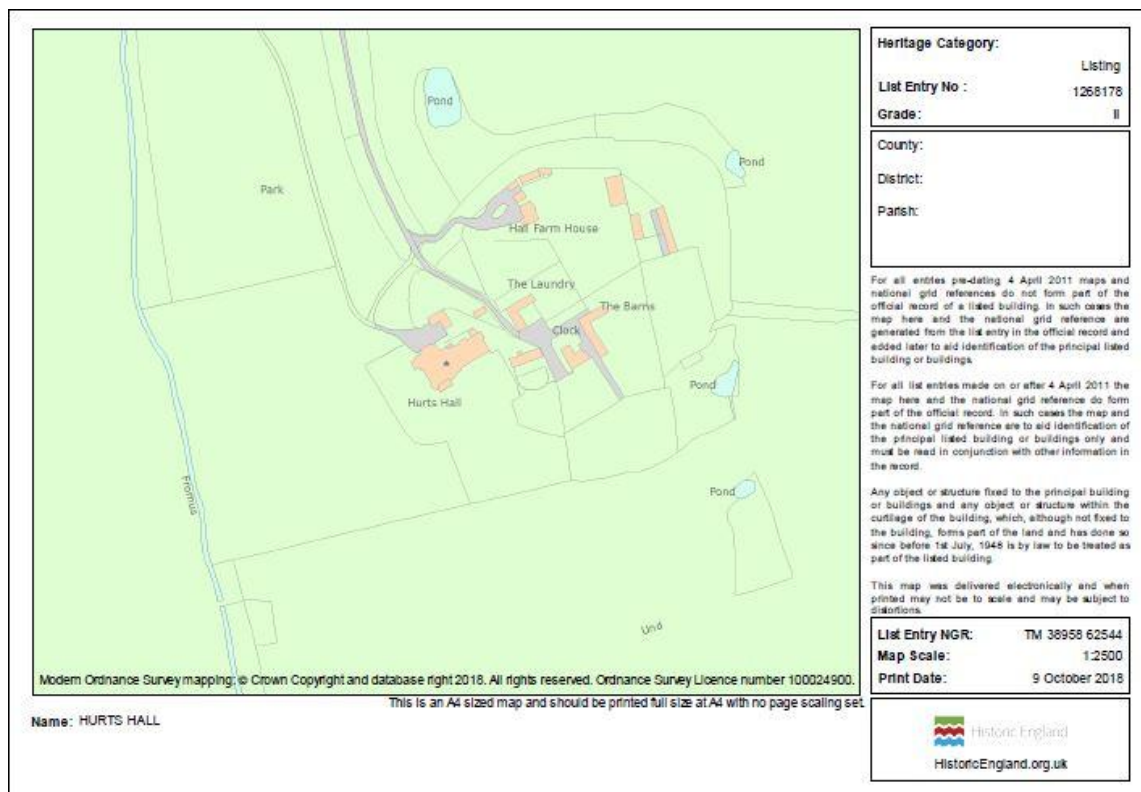
Country house. 1893; south front loggia extended in early C20. Diapered brick with ashlar dressings and rendered window surrounds; machine tile roofs with irregularly placed bands of 2 to 6 octagonal brick stacks. Jacobethan style: elongated rectangle running east-west with entrance to north. EXTERIOR: corners articulated by tall gabled projections and, at south-east corner, by polygonal bay through 2 storeys. Principal fronts to west and south. West front has tall gabled projection to left with a ground-floor bay window consisting of 3 pairs of cross casements. Single 2-light cross casement to first floor, 1-light casement to attic. Apex and base pinnacles to gable. Canted bay in angle with main elevation and three 2-light cross casements to right (2 to first floor). Canted 2-storey corner bay at south-east corner, with four 2-light cross casements to each floor. Crenellated parapet. South front with a 4-bay stone open loggia on Corinthian columns with a balustrade. Throughout, windows are generally 2-light cross casements arranged singly or grouped. INTERIOR: passageway from north entrance leads to 2-storey staircase hall. Open-well staircase with square panelled newel posts terminating with ball finials on volutes at the top and supported on consoles at the base. Twisted balusters. Closed string. Hall with teak wainscote panelling. Plastered ceiling of geometric patterns. Main reception rooms to south and south-east of hall with further, more elaborate, geometric plastered ceilings. Wide open arches to upper staircase landing. The present house replaced a house



by Samuel Wyatt of 1803, burnt down in 1889. (BOE: Pevsner N: Suffolk, 2nd Edition: Harmondsworth: 1974-: 413).



*Hurts Hall looking east from the B1121*



*Location Plan : Hurts Hall, Saxmundham © Historic England*

## Crown House, 30 South Entrance, Saxmundham

List entry number : 1268164

GV Grade II

Date first listed : 6 September 1974

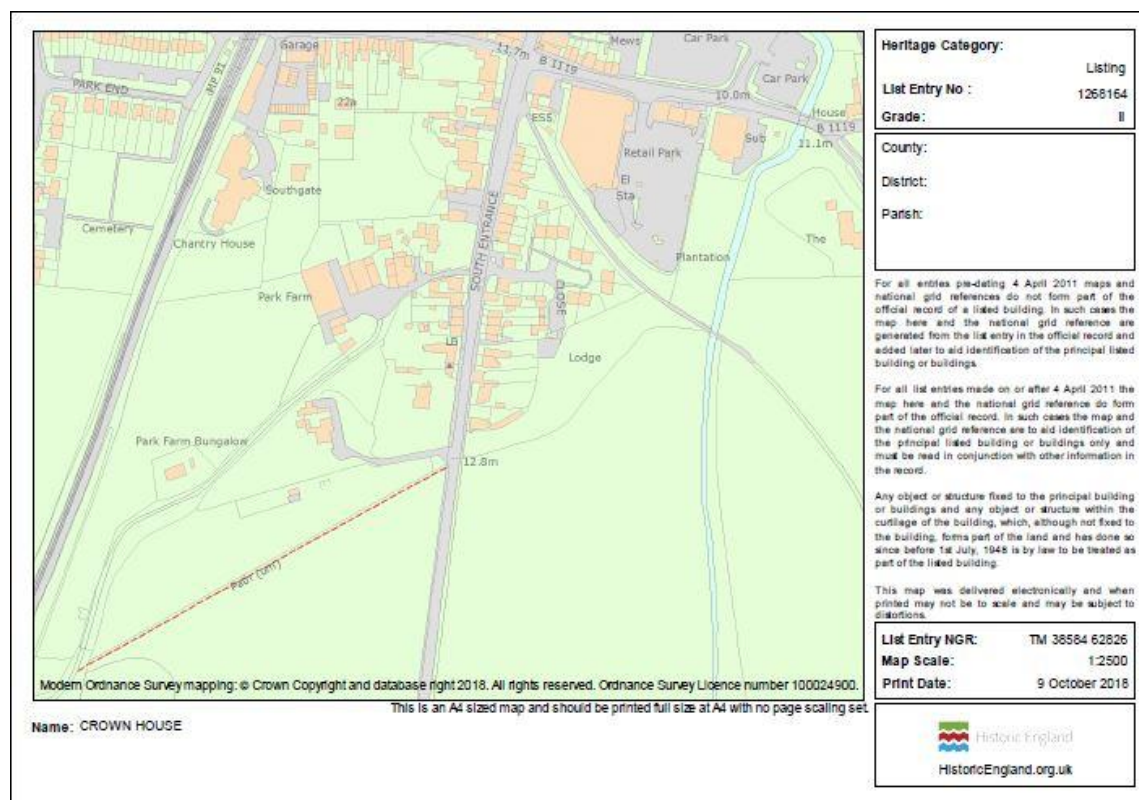
SAXMUNDHAM

TM3862 SOUTH ENTRANCE 841-1/4/43 (West side) 06/09/74 No.30 Crown House

House. Early C19. Painted brick; shallow pitched hipped slate roof with central ridge stack of red brick. EXTERIOR: 2-storey 3-window front. Central 6-panelled door, the panels with oval and diamond patterns. Patterned pilasters to doorcase. One 6/6 unhorned sash either side, under gauged skewback arches. Three similar first-floor sashes. INTERIOR: not inspected.



*Crown House looking to north west from South Entrance*



Location Plan : Crown House, Saxmundham © Historic England

## The White House, 28 South Entrance, Saxmundham

List entry number : 1268163

GV Grade II

Date first listed : 6 September 1974

SAXMUNDHAM

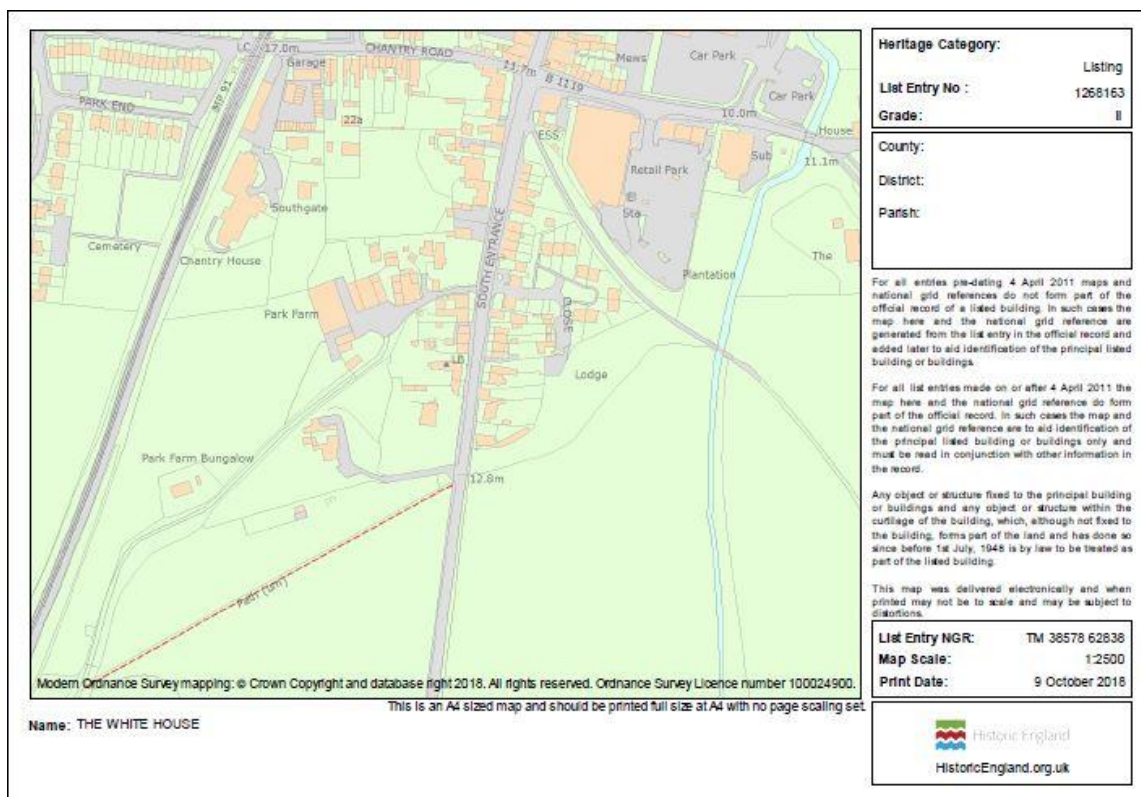
TM3862 SOUTH ENTRANCE 841-1/4/42 (West side) 06/09/74 No 28. The White House

Formerly known as: No.28 The Shrubbery SOUTH ENTRANCE. House. Late C18 with two early C19 rear extensions. Front of painted brick, right return rendered and whitewashed: slate roof with off centre ridge stack. Lobby-entrance plan. EXTERIOR: 2-storey 4 window front. Door to left of centre is of 6 fielded panels in doorcase of pilasters, frieze and pediment. Ground-floor sashes have 8/8 glazing bars, first floor sashes 4/8 glazing bars: window over door is blind. Dentil eaves cornice. Right return: gable wall of front range has 6-panelled door with glazed top panels in doorcase of panelled pilasters with flat hood. First floor and attic each have one C20 casement. INTERIOR: not inspected. (Saxmundham and District Local History Society: Saxmundham Old and New: Saxmundham: 1989-).





*The White House looking to west from South Entrance*



*Location Plan : The White House, Saxmundham © Historic England*

## Monks Cottages, 22, 24 & 26 South Entrance, Saxmundham

List entry number : 1268162

GV Grade II

Date first listed : 18 July 1949

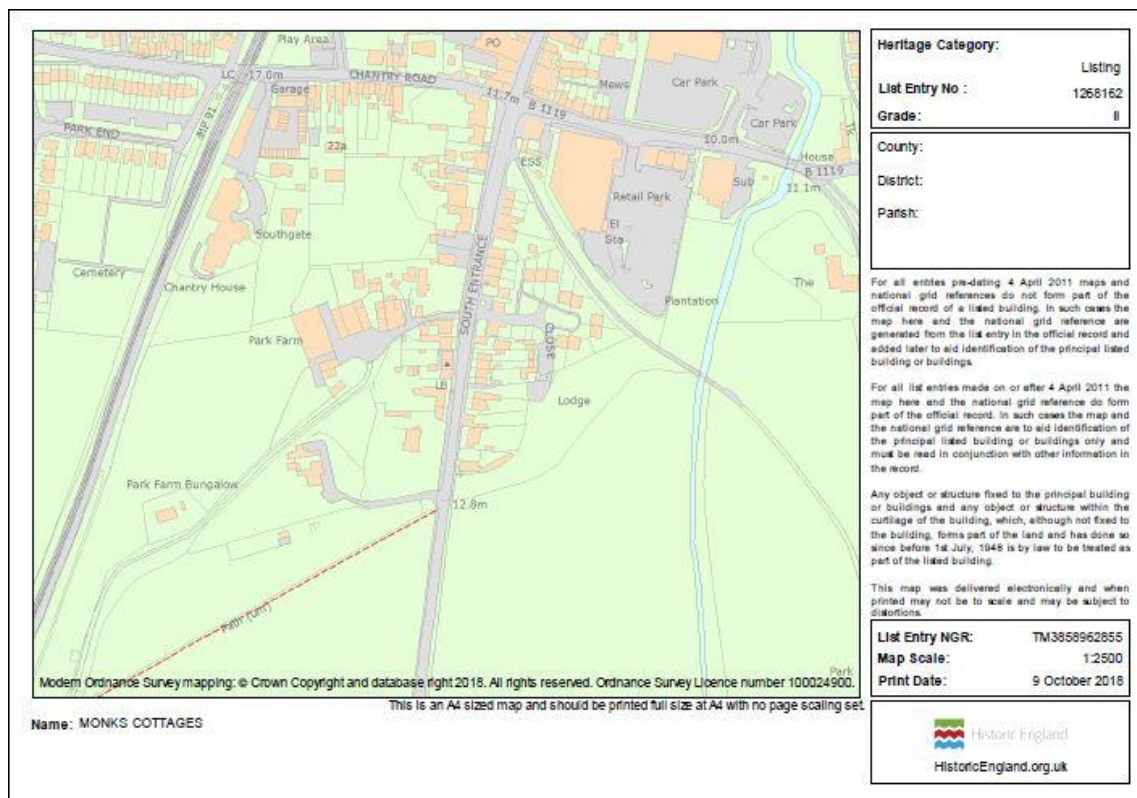
SAXMUNDHAM

TM3862 SOUTH ENTRANCE 841-1/4/41 (West side) 18/07/49 Nos. 22,24 AND 26 Monks Cottages

Formerly known as: Nos. 1, 2 AND 3 SOUTH ENTRANCE. Row of 3 houses. Early C18 with later alterations; left gable end rebuilt in late C20, pargetting to No. 22 renewed in C20. Plastered timber-frame, No. 22 pargetted; machine tile and plain tile roofs with ridge central to Nos 22 & 24, and at left end. EXTERIOR: 2-storey 5-window front; No. 26 has a higher roof than Nos 22 & 24. Each house has a 6-panel door, C19 to No. 22, C20 to Nos 24 & 26. Four late C18 three-light metal casements to ground floor; at extreme right end, No. 22 has one additional late C20 casement to right of door. On first floor, four late C18 3-light metal casements and one C20 2-light casement. Rear: 2-storey outshut. INTERIOR: not inspected.



*Monks Cottages looking to north west from South Entrance*



*Location Plan : Monks Cottages, Saxmundham © Historic England*

## Benhall Stores, Main Road, Benhall

List entry number : 1187694

GV Grade II

Date first listed : 21 September 1983

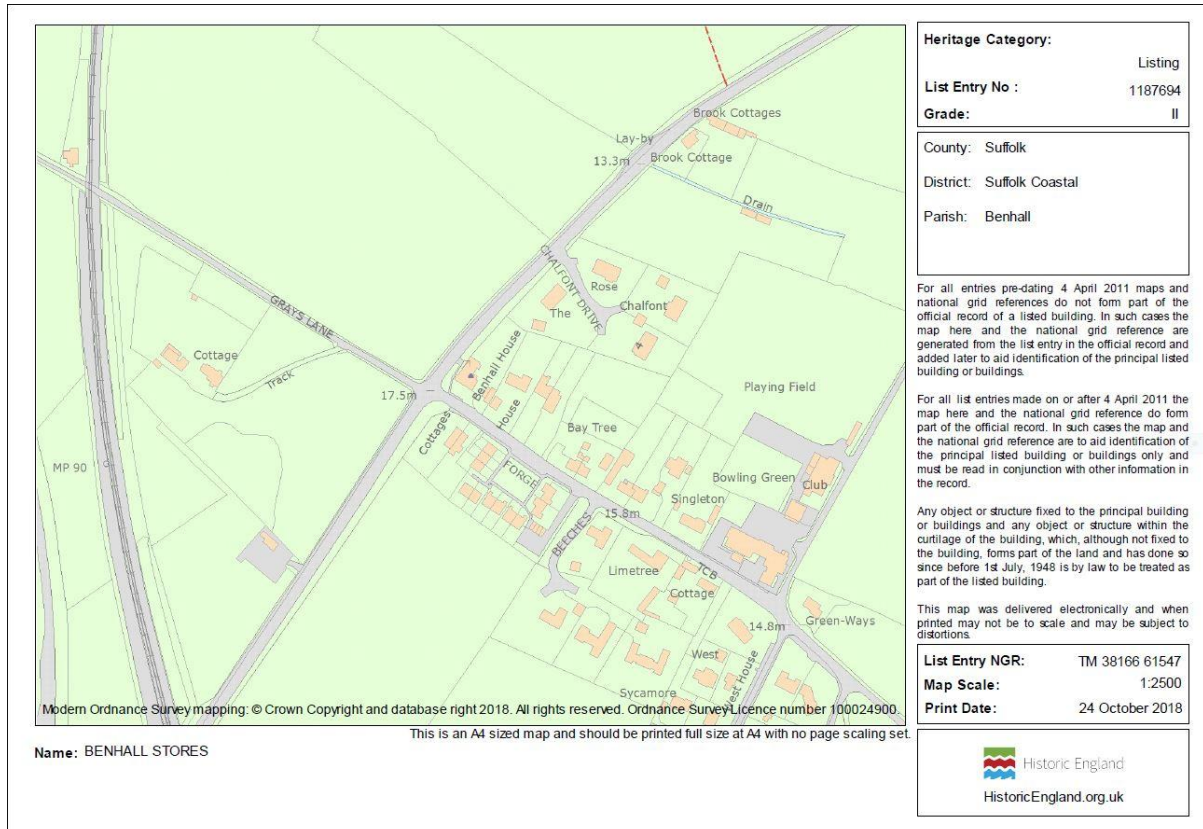
TM 36 SE BENHALL MAIN ROAD 2/24 Benhall Stores

The 'Horse and Groom' public house until the mid C19, now dwelling house and shop. Late C17/early C18. Timber framed and plastered in panels, coved cornice, plaintile roof. 2 storeys and attic. 4 window range, 2-light and 3-light casements, some with square leaded panes, Ground floor with 2 shop windows with square panes, the window to the right hand side having a moulded wood cornice; glazed shop door in similar style. 6-panel door to house with rectangular fanlight above. To right hand side is a C19 ground floor brick bay. Brick and pantile extensions to rear.





*Benhall Stores looking to east from Main Road © Google Street View*



*Location Plan : Benhall Stores © Historic England*

## Appendix B : References

- National Planning Policy Framework, DCLG, July 2018
- National Planning Practice Guidance : Conserving and enhancing the historic environment, DCLG, 2014
- Planning (Listed Buildings & Conservation Areas) Act 1990
- Historic Environment Good Practice Advice in Planning : GPA2 'Managing Significance in Decision-Taking in the Historic Environment', Historic England, July 2015
- Historic Environment Good Practice Advice in Planning : GPA3 'The Setting of Heritage Assets', Historic England, Dec 2017
- Conservation Principles, Policies and Guidance; Historic England, April 2008
- Suffolk Coastal Local Plan, First Draft Local Plan, July 2018
- Suffolk Coastal Landscape Character Assessment, Final Report, July 2008
- Settlement Sensitivity Assessment Volume 2, Suffolk Coastal, July 2018
- Suffolk Historic Environment Record
- National Heritage List for England : Saxmundham & Benhall  
[www.historicengland.org.uk/listing/the-list](http://www.historicengland.org.uk/listing/the-list)
- Historic England Images of England [www.imagesofengland.org.uk](http://www.imagesofengland.org.uk) : Saxmundham & Benhall
- Historical Map Archive : [www.old-maps.co.uk](http://www.old-maps.co.uk) Ordnance Survey County Series Maps Suffolk : Saxmundham & Benhall
- Guide to St John the Baptist, Parish Church of Saxmundham, Roy Tricker and St John's website [www.saxstjohns.org.uk](http://www.saxstjohns.org.uk)
- Saxmundham in the 1840s (a snapshot of village life in rural Suffolk), Suzanna G Burnay, Sigma Books, July 2002 (No 5 of the Suffolk Snapshots Series)