

**CARLYLE LAND LTD &
COMMERCIAL ESTATES GROUP**

**LAND SOUTH AND EAST OF
ADASTRAL PARK, MARTLESHAM
HEATH, IPSWICH**

HERITAGE STATEMENT

March 2017

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1.0 HERITAGE STATEMENT

1.1 This Heritage Statement has been prepared by Montagu Evans LLP on behalf of Commercial Estates Group and Caryle Land Ltd in support of an application to develop the land to the south and east of Adastral Park with 2,000 dwellings and associated facilities.

1.2 The description of development is:

“Outline application for up to 2,000 dwellings, an employment area of c. 0.6ha (use Class 1), primary local centre (comprising use Classes A1, A2, A3, A4, A5, B1, C3, D1 and D2), secondary centre (comprising possible use Classes A1, A3, A5 and D2), a school, green infrastructure (including Suitable Accessible Natural Green Space (SANGS), outdoor play areas, sports ground and allotments/community orchards), public footpaths and cycleways, vehicle accesses and associated infrastructure.”

1.3 The Statement should be read in conjunction with Chapter 7 of the ES: Archaeology and Built Heritage prepared by Montagu Evans LLP and Orion Heritage in support of an Application for Outline Planning Permission for land to the south and east of Adastral Park.

1.4 The proposals have been produced in consultation with Historic England, the Archaeology Service of Suffolk County Council and Suffolk Coastal District Council. The consultation response from Historic England is included as **Appendix 1**, with a letter explaining how the design has responded to these comments as **Appendix 2**.

Heritage Assets

1.4 **Section 7.5** of the Archaeology and Built Heritage ES Chapter provides an overview of the historical development of the local area and an in-depth appraisal of the significance of heritage receptors which could be potentially affected by the Proposed Development, and the contribution of their setting to this significance. This was based on documentary research, a desk-based review of OS maps, and site surveys. The level of detail is proportionate and sufficient to understand the potential impact on their significance, consistent with paragraph 128 of the NPPF.

1.5 The Site contains two Scheduled Monuments (SM) and a number of Second World War fortifications, which we have identified as non-designated heritage assets (NDAs) in accordance with Suffolk Coastal District Council's *Criteria for the Identification of Non-Designated Heritage Assets that are Buildings* (2015). These are:

- Two Bowl Barrows in Spratt's Plantation (SM);
- Bowl Barrow and Pill Box 450m north west of Sheep Drift Farm (SM);
- Eight Sided Brick Built Base to Radio Mast (NDA) ;

- Type 23 Pillbox associated with gun emplacement and underground shelter (NDA); and
- Possible light anti-aircraft machine gun post (NDA).

1.6 There are also a number of other designated heritage assets in the wider area:

- Bowl Barrow 155m east of Sheep Drift Farm (SM);
- Bowl Barrow 180m ENE of Sheep Drift Farm (SM);
- Bowl Barrow on Waldringfield Heath, 150m south of Heath Farm (SM);
- Bowl Barrow in Birch Grove, Martlesham Heath (SM);
- Bowl Barrow in Lancaster Drive, Martlesham Heath (SM);
- Pole Hill Bowl Barrow (SM);
- Two Bowl Barrows 312m south west of Dobbs Corner (SM);
- Church of St John the Baptist (Listed Grade II*);
- Howe's Farmhouse (Listed Grade II); and
- Thatch Cottage (Listed Grade II).

1.7 The location of these receptors is illustrated on a heritage receptor map included at Appendix 7.2 of the ES.

Statute and Policy Context

1.8 **Section 7.4** of the ES Chapter also contains a comprehensive list of the relevant Statutory and Development Plan policies which are applicable to the Site and the Proposals, so these are not repeated here. In general there is a strong statutory and policy presumption in favour of the preservation of the scheduled monuments and listed buildings, but the protection of the non-designated heritage assets has less weight in the planning balance.

Policy Assessment

1.9 The proposals have been produced in an iterative design process in consultation with statutory heritage and archaeology consultees at Historic England, Suffolk County Council and Suffolk Coastal District Council. The design includes a number of mitigation measures which seek to reduce harmful effects and enhance the setting and ability to appreciate the heritage value of the Site. These include the following:

- The implementation of a well-considered masterplan that respects the setting of heritage assets, including the creation of a large public open space around the

scheduled monument and retained WWII structures to enhance their public appreciation and group value. This includes a buffer of a minimum of 15 metres from the scheduled monument to built form, and considerably more to the east;

- The clearing of vegetation and rotting leaves from the scheduled barrows to enhance public appreciation of their heritage value;
- The felling of trees growing on the barrows in Spratt's Plantation to prevent potential damage from trees uprooted by high winds;
- The installation of low timber fences around the Scheduled Monuments to prevent potential erosion by mountain bikes and other similar activities;
- An interpretation strategy for the barrows and WWII structures to enhance public appreciation of their heritage value;
- The conversion of pillboxes to bat roosts to secure a meaningful use for the buildings; and
- The restoration of the octagonal brick WWII structure and its incorporation into the landscape strategy including ornamental planting and benches.

1.10 **Section 7.6** of the ES Chapter considers the resultant effect of the Proposals on the setting and ability to appreciate the significance of the Scheduled Monuments and non-designated heritage receptors. The conclusions of the assessment are summarised here, with comment on the compliance with relevant planning policy.

Heritage Assets within the Application Site

Two Bowl Barrows in Spratt's Plantation and Bowl Barrow and Pill Box 450m north west of Sheep Drift Farm (Scheduled Monuments)

1.11 The setting of the scheduled barrows is already characterised by its proximity to Adastral Park, and to a lesser extent the existing quarry. The barrow with the pill box in the south-west of the Site has a particularly degraded setting where Pegasus Tower and the 7 storey blocks of Adastral Park are prominent, detracting features, as is traffic noise from the A12. The setting of the barrows in Spratt's Plantation is better, being characterised by woodland.

1.12 The proposals will bring built form closer to the monuments. The masterplan has given careful consideration to the setting of the monuments and includes a minimum of a 15 metre buffer to the built form, although in most cases significantly more. A larger area of open space surrounding the barrow in the south-west of the site was agreed during pre-application discussions, to encompass and connect the WWII structures. This will enhance the perception of the group value of the scheduled pill box.

1.13 The clearing of vegetation from the scheduled barrows will make it easier to see them and enhance public appreciation of their significance. Public access will be provided to the barrows, with interpretation to further enhance understanding of their significance.

- 1.14 It is proposed to fell the trees growing on top of the scheduled barrows in Spratt's plantation to prevent potential damage if they are blown over in high winds. The scheduled pill box will be converted to a bat roost to secure a meaningful long term use of the building. Both these works will require separate Scheduled Monument Consent. Low timber fences are proposed around the Scheduled Monuments to prevent erosion by mountain bikes and similar activities; these will be installed outside the scheduled area so will not require SM Consent.
- 1.15 Our assessment is that the Proposed Development will not harm the setting or appreciation of the significance of the Scheduled Monument in any respect. Notwithstanding our view, if a different opinion is reached, for example that the urbanisation of the setting of the monuments is harmful, then this harm would be more than outweighed by the other heritage benefits which clear vegetation to reveal the barrows to the public, provide interpretation to enhance public appreciation, undertake mitigation measures to remove trees that could damage the monument, enhance the group value and secure a meaningful use for the pill box. The residual effect is clearly beneficial even for those that may find harm in the change to the character of the setting of the monuments, which we do not. The statutory provision, NPPF (paragraph 132) and recent case law (Barnwell etc) emphasise that any such enhancement to a designated heritage asset is a matter of considerable importance and weight in the planning balance. The proposals better reveal the significance of the scheduled monuments consistent with paragraph 137 of the NPPF. It is also consistent with local policy SP15 of Suffolk Coastal District Local Plan Core Strategy and Development Management Plan.

Eight Sided Brick Built Base to Radio Mast, Type 23 Pillbox associated with gun emplacement and underground shelter (NDAs)

- 1.16 The eight sided brick base and Type 23 pill box are to be retained within an area of open space, which will allow them to be seen alongside the Scheduled pill box surmounting a barrow. These are contemporaneous features built during the Second World War, and the proposals will enhance the opportunity to appreciate their group value and special interest. Interpretation will further enhance public understanding of the significance of these assets.
- 1.17 The pill box will be converted to a bat roost which will provide a meaningful long term use for the structure, while enhancing the ecology of the site. The octagonal brick structure will be restored, a roof/top added to shed rainwater surrounded with ornamental planting and benches, which will enhance the asset and its immediate setting.
- 1.18 By retaining and enhancing these non-designated heritage assets the Proposals are making the most of the heritage value of the site, in accordance with paragraph 135 of the NPPF. The Proposed Development will result in a net enhancement to the appreciation of the significance of non-designated heritage receptors.

Possible light anti-aircraft machine gun post

- 1.19 The possible light anti-aircraft machine gun post is in poor condition, and has metal protrusions which present a safety hazard. Consequently, it is to be removed from the Site as part of the proposals.
- 1.20 The receptor is of low significance and its removal will result in a low level of harm to the historic environment, which can be partly mitigated through detailed recording. The record should be kept by Suffolk Historic Environment Record. In devising the masterplan, a balanced judgment has been undertaken regarding the scale of harm or loss of this receptor, in accordance with Paragraph 135 of the NPPF is met. Historic England and Suffolk Coastal DC agreed to the principle of this during pre-application discussions.
- 1.21 Therefore, the Proposals meet the requirement to enhance and preserve the distinctive landscape value and character of the Application Site, in accordance with **Policy SP15** of the Suffolk Coastal District Local Plan Core Strategy and Development Management Plan.

Heritage Assets outside the Site within the study area

- 1.22 There are a number of Scheduled barrows, listed buildings and non-designated heritage assets in the study area. Our assessment is that the Proposed Development would have a negligible or no effect on the ability to appreciate their significance, in other words there will be no material effect. This is consistent with national and local planning policies on the historic environment and the statutory provisions in the 1990 Act.

Conclusion

- 1.24 Great weight has been given to the conservation of heritage receptors within the Application Site, in accordance with Paragraph 132 of the NPPF. We conclude that no harm to the special interest of heritage assets would occur as a result of the Proposed Development, therefore the provisions of paragraphs 133-134 are not relevant to this assessment. There is no below-ground archaeology of demonstrable equivalence to a scheduled monument, so paragraph 139 of the Framework is not relevant either.
- 1.25 The proposals comply with all relevant national and local planning policy on the historic environment, including Policy SP15 of Suffolk Coastal District Local Plan Core Strategy and Management Plan. In granting planning permission for the application, the LPA would be discharging its statutory duty with respect to section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act (1990).

Appendix 1

Letter from Historic England, 14 March 2017



Historic England

FAO Ben Woolnough
Suffolk Coastal District Council

BY EMAIL

Our ref: P00055006
Your ref: DC/16/5277/SCO

Telephone 01223582710

14th March 2017

Dear Ben

Re: Land to the South and East of Adastral Park, Martlesham Heath, Suffolk

Thank you for the revised plan which details the changes that are proposed to the Masterplan in relation to the designated barrow and the non-designated WWII sites on Martlesham Heath. Please find specific comments set out below.

Historic England Advice

As discussed last week we are much encouraged by the revisions to the masterplan as shown in the plan extract (Ref: Broadway Malyan DRAFT 24.02.17). We feel that this is moving in the right direction in terms of seeking to reduce the impacts of the development on the designated barrow and pill box. It is worth noting that the development will still have an impact upon the significance of the barrow through a development within its setting and that this will result in some harm to the asset. We do however we accept the development in principle and consider that the revisions have sought to reduce the harm. We would however like to see some further revisions to the masterplan, and to understand how the safety and setting of the barrow and the non-designated heritage assets can be secured during and after the development.

In particular, we would want to see some further revisions to the areas of housing around the barrow, primarily the blocks on the south western side of the asset and the corresponding one the north-western side. This is to increase the space around the barrow to the west, to push back the housing and to increasing the buffer from 15 m and 23 m respectively.

We would also like to see the view point (labelled 7 on the plan) open up to increase the views from the barrow/pill box and to include views from the other assets (noted 2 on the plan) through to the BT Centre and Adastral park area. This is to make a visual link between the pill box and the former airfield to which they were linked.



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



We would also want to know more details about the type, design, height and mass of the properties which face the barrows, and at what stage this information would become available. We would want to be reassured that there would be a high quality of design for the houses that face on to the barrow area, but also to see the development of a good sense of place. This would include measures like ensuring that there the roads, bins and parking areas are placed to the rear of these houses, leaving only soft landscaping, footpaths and cycleways between the houses and barrows. We are looking to the council to develop a robust strategy for implementation, and would want to know how the council would secure this.

In terms of landscaping we would like to see the area around the barrow remain as open as possible, we would like to see the tree and scrub planting reduced and the replaced with open heath habitat. There should be clear views from the pill box to the non-designated WWII features across this space and we would also want see the number of pathways minimised and developed in sympathetic materials without hard-top such as tarmac.

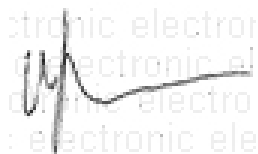
One of the issues will be to ensuring the safety of the barrow and the non-designated heritage assets in this area during the development process, and legally securing the interpretation and on-going management and maintenance of these assets post development Some measures may need to be taken to protect the barrow and ensure it is not seen as a suitable place for mountain bikes or damaging recreational activities

We also want to know further details of how the Council would seek to secure and implement the conservation of the designated and non-designated heritage assets in this area and their interpretation. In our view it would be appropriate to commission a monument management plan or conservation management plan which sets out these issues and is linked through to the on-going management post development. The agreement would need to be legally binding and secured through the s.106 agreement.

Recommendation

We realise the process is moving rapidly at the moment, but this is an important element of the scheme and we would appreciate a further opportunity to discuss with your council the strategy for developing this quarter, and how the condition's and policies are likely to be implemented. We would be happy to discuss these issues further in order to agree a way forward in relation to the points raise above, however if we are not able to agree further changes and are not reassured about the future management of the designated heritage assets it is unlikely we would be able support the scheme.

Yours Sincerely



Dr William Fletcher, Inspector of Ancient Monuments (Norfolk, Suffolk and Bedfordshire)

Will.Fletcher@historicengland.org.uk



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Appendix 2

Response to Letter from Historic England, 22 March 2017

CM/LM/AR/PD10995

email: chris.miele@montagu-evans.co.uk and lucy.markham@montagu-evans.co.uk

22 March 2017

Mr B Woolnough
Suffolk Coastal District Council
Riduna Park
Station Road
Melton
Woodbridge
IP12 1RT

Dear Ben,

RE: LAND TO THE SOUTH AND EAST OF ADASTRAL PARK, MARTLESHAM HEATH, SUFFOLK

We write in response to the comments made by Historic England in a letter dated 14th March 2017 regarding the proposed development and in particular drawing "Heritage Layout, Broadway Malyan – DRAFT – 24.02.17" and the treatment of the Scheduled barrows and non-designated heritage assets at land to the south and east of Adastral Park. For clarity, we have structured our response to address Historic England's concerns paragraph by paragraph.

Page 1, Paragraph 3

We note Historic England's feedback regarding the extent of buffer zones around the barrow and non-designated heritage assets. Our judgment remains that the buffer zones are appropriate for this site and sufficient to preserve the special interest of the heritage assets. We remain of the view that the proposed development and landscaped buffer zone would be beneficial to the setting of the barrow.

Notwithstanding the above, if you, the Council, consider that there is harm to the assets as a result of encroachment, this would need to be weighed against the benefits of the proposed development.

Page 1, Paragraph 4

Historic England note that they would like viewpoints opened up to create a visual link between the pill box and the BT Centre, we understand that this is on the basis that both are sited within a former airfield complex. Broadway Malyan has prepared a revision to the illustrative framework plan (drawing 31677 08) and the heritage park layout (drawing 31677 12) to increase the space between the development blocks to take account of Historic England's comments. Although the historic connection might not be immediately apparent to the viewer given the form and bulk of the 1960s BT Centre, with interpretation aides the former relationship can be revealed.

It has always been considered that a scheme of interpretation could make the link between the site and its historic use explicit, and it is anticipated that this would be required as part of a condition on any granting of planning permission.

Page 2, Paragraph 1

Historic England has requested details about the type, design, height and mass of the properties which will face the barrows. As this is an outline application, it is not usual to have this level of detail at this stage. However, to provide sufficient assurance to Suffolk Coastal District Council (SCDC) and to guide the subsequent reserved

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matters, the heritage park layout (drawing 31677 12) will be submitted as part of the planning application. Additionally, the Design and Access Statement (DAS) accompanying the planning application, includes images to indicate options for how the area of green infrastructure focussed on these heritage assets will be framed by the built form.

In response to Historic England's comments Broadway Malyan has prepared revisions to the illustrative framework plan (drawing 31677 08) and the heritage park layout (drawing 31677 12) to reduce the amount and dominance of the roads whilst ensuring a balance between how the area functions and how it is enjoyed.

It is anticipated that there will be a site-wide landscape management strategy/plan with areas, such as the proposed heritage park and central lake and heath having detailed sections to ensure delivery of a high standard of design for these areas. CEG/CLL consider these to be important to the creation of public realm and a sense of place. The requirement for a landscape management plan could be sought via a condition, outlining the approach to the treatment and management of the open space around the assets. This could include provision of measures to protect and interpret the feature as part of the landscape strategy, taking into account Historic England's comments. We would be happy to draft such a condition for your consideration.

Page 2, Paragraph 2

We are in agreement with Historic England regarding the creation of clear views between the pill box and non-designated WWII features across this space. The illustrative framework plan and heritage park layout plan commit to this.

Page 2, Paragraphs 3 & 4

We feel that a conservation management plan is not necessary for this site, as plans for the conservation of the barrow can be articulated through a landscape strategy, which would include measures to protect and interpret the feature. We are in agreement with SCDC that measures to protect and interpret the features are important; the wording of a planning condition to secure this can be discussed following submission of the planning application.

Page 2, Paragraph 5

As recognised, there is a limited amount of time before the submission of the application. However, we are happy to further progress discussions with SCDC and Historic England following submission of the planning application should you and colleagues deem this beneficial.

We hope this provides clarification on our position, and addresses the main points of concern.

Yours sincerely,



CHRIS MIELE
SENIOR PARTNER
MONTAGU EVANS LLP

