



Historic England

EAST OF ENGLAND OFFICE

Mr John Pateman-Gee  
Mid Suffolk District Council  
Planning Control Dept  
Council Offices  
Needham Market  
Ipswich, IP6 8DL

Direct Dial: 01223 582751

Our ref: P00537565

04 December 2016

Dear Mr Pateman-Gee

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP  
(Development Management Procedure) (England) Order 2015  
LAND NORTH OF OLD STOWMARKET ROAD, WOOLPIT, SUFFOLK, IP30 9QS  
Application Nos 4491/16 & 4489/16**

Thank you for your letters of 10 November and 2016 notifying Historic England of the above applications

**Summary**

The applications comprise the Outline permission for the development up to 79 dwellings (with all matters reserved except for access) and the Change of Use of part of the application site from agricultural to open space. The Change of use includes a surface water management scheme and wildlife enhancement. Our advice below is for both planning applications.

Historic England provided pre-application advice on the scheme to Sheppard Architects LLP on the 25<sup>th</sup> May and 16<sup>th</sup> June 2016 (Our ref: PA00428164). Our advice below reflects our earlier comments.

The proposed development would impact upon the setting of the scheduled monument known as 'Lady's Well (holy well and moat)', the grade I listed church of St Mary and Woolpit Conservation Area. It is our view that this impact would result in harm to the significance of these designated heritage assets; however design scheme changes could be incorporated in order to reduce the level of that harm and provide additional public benefits. We also require further information in order to fully assess the application for the Change of Use. We would recommend the applications are withdrawn, or decisions deferred, to allow the additional information to be provided and design changes to be considered.

**Historic England Advice**

The Lady's Well scheduled monument comprises an irregular, partially water-filled, moat surrounding a moderate sized moat island. The site is unoccupied and the current land-use is given over to scrub vegetation and trees. A spring is located at the base of the southern arm where a brick chamber has been constructed around the



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spring head and is thought to be the site of the 'holy well'. The scheduled monument is also associated with the possible site of a medieval chapel, thought to be on or close to the moated site; although recent works looking at the history of the site (detailed in the application documents) suggests this interpretation may need to be reviewed. The scheduled monument contains good evidential information for its historic nature and extent, including the earthworks of the moat and a good potential for buried archaeology within the island and palaeoenvironmental deposits within the moat. The spring and spring head provide added physical interest. Together with the local historical interest, the monument's significance is also enhanced by strong communal values linked to the holy well, the (possible) chapel and local folklore.

The setting of the scheduled monument is an important aspect of how the site is understood and positive elements of this setting contribute to the monument's significance. This includes its visual context, its association with other assets (such as the nearby grade I listed church) and its relationship with the wider historic landscape. The immediate surroundings of the monument are particularly important. The moat has historically been situated in a relatively isolated location away from the main focus of settlement, surrounded by a largely undeveloped, rural and agricultural landscape. This landscape has been eroded in the latter part of the 20<sup>th</sup> century and the undeveloped and 'isolated' elements of the monument's setting are now only preserved in the open fields to the south and east - e.g. the application site and, to a lesser degree, the land beyond this south of Old Stowmarket Road. These areas reflect the character of the monument's contemporary surroundings and allows it to be experienced in something close to its original context. They are positive elements of its setting. The land south of Old Stowmarket Road has recently received planning approval for the construction of up to 120 dwellings and this, together with the existing development surrounding the monument, makes the area of the application site one of the last remnants of the 'historic' landscape. This increases its importance as part of the setting of the monument (and the church and conservation area) and its contribution to significance.

The application site provides historic context and forms an important element within the setting of the grade I listed church of St Mary. It is situated on a historical route into the village; with important views of the church tower and spire. The steepled church is the dominant built feature within the landscape on this eastern side of the village, and is visible in long views from a number of locations when approaching to and passing the settlement, including rising above the trees in views from the application site. The spire enhances the church's dominance and highlights how it was designed to be experienced as a landmark within the wider landscape setting. The application site also contributes to the character of the conservation area. The density of buildings decreases on the eastern side of the settlement and although some scattered development (such as the nursery) lies further east of it, the proposed development site is still recognisable as the outer edge of the village where it joins open countryside. It is important in establishing the character of conservation area at this



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historic interface with surrounding countryside. In addition to our advice below, consultation should also be undertaken with the Local Planning Authority's Conservation Officer on the impact upon these two heritage assets.

The current applications are supported by Planning, Design and Access and Heritage Statements. These are supplemented by an Archaeological Desk-Based Assessment and geophysical survey report. The Heritage Statement has provided a detailed assessment of the significance of the designated heritage assets affected by the proposed development, including a good consideration setting and the contribution it makes to the significance of these assets. This has taken on board the comments made by Historic England at the pre-application stage in regards to the setting of the scheduled monument, the character of the conservation area and the views of the church spire.

Although we welcome much of what the Heritage Statement presents; we disagree with some of the overall conclusions. We would place a greater emphasis on the importance of the undeveloped character of the scheduled monument's setting (e.g. the application site) in terms of understanding and experiencing the monument's historic context, and that of the church and conservation area. We note the Statement's comments regarding the visibility and the tree cover over the moated site; however we do not agree this alters how it is experienced within the landscape to the degree suggested in the Heritage Statement. It should also be noted that the screening from tree cover would reduce seasonally and it is not permanent or the optimal land-use - a reduction in tree and vegetation cover would improve the condition of the monument and would be strongly encouraged by Historic England as part of any future management works. The current application proposes up to 79 dwellings and there is little consideration in the applications of the impact from a development with such a high density on application site of this size, and in close proximity to the scheduled monument. We also consider there to be a higher cumulative impact than suggested in the Statement, particularly with the approved c. 120 houses on the site south of Old Stowmarket Road.

We recognise that the applicant has taken steps to reduce and minimise the impact of the development and substantial changes have been incorporated since the original designs were submitted at the pre-application stage. We welcome the amendments which have changed the western half of the site from housing to open space, removing development from within the conservation area and restoring the line of the historic field boundary. We also welcome the changes which have pulled the building line back in the south of the application site, creating an open space along the 'front' of the development. This has reduced the intrusion of the development upon the historic route into the village and conservation area, and removes and reduces the intrusion of the housing and infrastructure into the important views towards the spire of the grade I listed church. Around the scheduled monument, areas of 'open space' would be retained to the south and, to a lesser degree, on the east. We welcome the proposals



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to re-orientate the housing along the western edge of the development so that properties face out on to this open area and the scheduled monument, creating a sense of ownership and increasing awareness of the site and its significance. Similarly we have no objection to improving public access to the scheduled monument which could enhance the understanding and communal value of the site. We also support the burying of the overhead power-lines, removing these from the monument's setting, and improvements to the eastern and northern boundaries of the application site which would further screen and soften the existing development in this area.

The application notes some of the other concerns raised in our pre-application consultation; however does not fully assess the impact or potential level of harm from these - for example the impact upon setting from noise and lighting. In addition to this we highlighted that there could be potential hydrological impacts from placing large ponds in close proximity to the water-filled moat; however we can see no consideration of this in the application documents. This is particularly pertinent given the application for Change of Use includes permission for the surface water management scheme and places several ponds due south of the scheduled monument. We also note that there are some tentative proposals for a car park within the open space to the south and possibly adjacent to the scheduled monument to allow better access. Whilst we do not object to the principle of improving the access here; further assessment and consultation would be required to understand what this would comprise of and what the potential impact would be. The character of the open space, which the Application states is designed to preserve the setting of the heritage assets, could be greatly changed by the introduction of an unsympathetic car park which, for example, included areas of hard standing or required tall street lighting.

In terms of the housing, we welcome the approach to avoid a 'suburban' character and create a distinctive sense of place with design, style and materials which draw upon the local vernacular forms. We do however have strong concerns with the density proposed of up to 79 dwellings. This would substantially increase the impact of the development upon the setting of the designated heritage, in particular the scheduled monument. The last pre-application proposals we received showed a density closer to c. 45 dwellings which, if the application were approved, would be far less intrusive. A lower density would also allow far greater flexibility in the design and layout of the development. For example, whilst we welcome the orientation of the properties facing out onto the open space and scheduled monument, the impact could be further reduced by relocating the access and parking to the rear of the properties. Similarly, a lower density would allow more space to create a larger open buffer to the east of the scheduled monument, helping to preserve the monument's setting.

The application site forms an important element of the settings of the scheduled monument, conservation area and grade I listed church, providing historic context and enhancing our understating of the significance of these assets. The proposed development would introduce up to 79 residential properties (and associated



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infrastructure, access and landscaping) into these settings. The built elements of the development would block or intrude into views towards all three assets and would erode the important open, undeveloped and agricultural character and historic context. It is our view that this would adversely impact upon the setting of designated heritage assets and result in harm to their significance. In the terminology of the National Planning Policy Framework (NPPF) the level of this harm would be 'less than substantial'. Within that 'less than substantial' scale we would consider the level of harm to the grade I listed church and conservation area to be 'low to moderate', but a 'moderate to high' level of harm to the scheduled monument. The potential indirect physical impact upon the scheduled monument from changes in the hydrology, or any impact upon its setting from additional development within the open space to the south, cannot be assessed without further information.

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting, local planning authorities shall have special regard to the desirability of preserving the building or its setting (Paragraph 66.1). Special attention shall also be paid to the desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of any powers under the planning Acts (Paragraph 72). The NPPF builds upon the 1990 Act. It identifies the conservation of heritage assets as a core principle of the planning system (Paragraph 17). The significance of heritage assets can be harmed or lost by development in their setting and, in line with NPPF paragraphs 132 and 134, *any* harm to the significance of designated heritage assets requires clear and convincing justification and must be weighed against the public benefits of the scheme. It is important that proposals seek to minimise the conflict between a heritage asset's conservation and the proposal, in line with Paragraph 129 of the NPPF. Proposals should also seek opportunities for the development to enhance or better reveal the significance of the designated heritage, in line with NPPF Paragraph 137.

It is our view that amendments could be incorporated into the proposed development in order to reduce the level of impact and harm. Key to this would be a reduction in the density of the housing, changes to layout and increasing the open space around the scheduled monument. We acknowledge that the application has sought to minimise conflict, incorporate public benefits and enhance significance. However it is our view that there is still scope to consider further beneficial elements such as new interpretation and works (secured through management agreements or legal arrangements such as Section 106) to improve the physical condition of the scheduled monument. Further information is also required for some aspects of the two applications, in particular the water management systems and possible car park on the open space in the west of the site and the impact of these proposals upon the scheduled monument.



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Although we appreciate that the current application for the main development is Outline, we would consider it important that the issues discussed above are resolved before this application, or that for the Change of Use, is determined. It is important that the Council has sufficient information as to fully assess the impact of the proposed works, to make a reasoned judgment as to the level of harm and be able to weigh that harm against the public benefits of the scheme.

In addition to the impact upon the setting of the designated heritage assets, the proposed development would require substantial groundworks which could impact below ground archaeology (non-designate heritage) within the application site. We note the comments from Suffolk County Council Archaeological Service on this matter and we support their recommendation for pre-determination evaluation works of this area.

**Recommendation**

We would recommend the outline application and application for Change of Use are both withdrawn, or decisions deferred, to allow additional information to be provided and changes to the proposed development to be considered.

Should, notwithstanding our advice, the Council proposes to determine the applications in their current form, you should be satisfied that you have sufficient information to fully assess the impact of the works. Clear and convincing justification is required for the harm to the significance of the designated heritage assets, and the Council should be satisfied that that harm is clearly outweighed by public benefits which could not be realised through a less harmful scheme. Should the application be approved, we would recommend Conditions are attached to ensure control over the design and layout of the proposed development and to secure the proposed benefits to the designated heritage assets, in line with consultation with Historic England.

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

Yours sincerely

**Nick Carter**

Assistant Inspector of Ancient Monuments  
E-mail: [nick.carter@HistoricEngland.org.uk](mailto:nick.carter@HistoricEngland.org.uk)

cc.Rachael Abraham, Senior Archaeological Officer, Suffolk County Council Archaeological Service



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**From:** RM PROW Planning  
**Sent:** 24 November 2016 11:03  
**To:** Planning Admin  
**Subject:** RE: Consultation on Planning Application 4491/16

**For The Attention Of: John Pateman-Gee**

## **Rights of Way Response**

Thank you for your consultation regarding the above planning application.

Please accept this email as confirmation that we have no comments or observations to make in respect of this application affecting any public rights of way.

Please note, there may also be public rights of way that exist over this land that have not been registered on the Definitive Map. These paths are either historical paths that were never claimed under the National Parks and Access to the Countryside Act 1949, or paths that have been created by public use giving the presumption of dedication by the land owner whether under the Highways Act 1980 or by Common Law. This office is not aware of any such claims.

Regards

**Jennifer Green**

**Rights of Way and Access**

**Part Time - Office hours Wednesdays and Thursday**

Resource Management, Suffolk County Council

Endeavour House (Floor 5, Block 1), 8 Russell Road, Ipswich, IP1 2BX

## **WOOLPIT PARISH COUNCIL**

### **Planning Applications, Land North of Old Stowmarket Road, Woolpit.**

#### **4491/16. Change of use from agriculture to open space including a surface water management scheme and wildlife enhancement area.**

Woolpit Parish Council objects to this proposal for the following reasons:

1. Bearing in mind the proximity to Lady's Well, a Scheduled Monument, a full archaeological survey and assessment, rather than a desk-top, is necessary before any planning permission is granted.
2. A Landscape Appraisal needs to be undertaken to ensure appropriate treatment of the setting of the Scheduled Monument and the proposed Conservation Area.
3. A management plan for the proposed wildlife area should be provided.
4. There is no provision for cycle tracks across the open space either to access the village and Health Centre from the development or to access Lady's Well.
5. A direct cycle footpath/cycle track should be provided across the open space from near plot 12 to the Heath Road/Old Stowmarket Road crossroads. The crossroads is the nearest point to the village and the shortest distance to the crossroads is the route that residents will take from the houses to the village.
6. The developer should be required to contribute towards the planned cycle path from Woolpit to Elmswell which passes the site.
7. Parking should be provided near Lady's Well for users of the site. Not every visitor will be able to access the site by foot or cycle. Vehicle access is required for maintenance purposes and the existing access direct off Elmswell Road is dangerous.
8. A commitment to remove all the overhead electricity wires across the entire frontage of the Lady's Well site should be provided. It will not be satisfactory to terminate the overhead section of wires either within or in front of the Scheduled Monument site.

#### **4489/16. Application for Outline Planning Permission with all matters reserved, except for access, for the erection of up to 79 dwellings.**

Woolpit Parish Council objects to the proposal for the following reasons:

1. Bearing in mind the proximity to Lady's Well, a Scheduled Monument, a full archaeological survey and assessment, rather than a desk-top, is necessary before any planning permission is granted.
2. Para 4.13 of the applicant's Transport Statement says that each property shall have two cycle storage spaces per dwelling. However, no provision has been made for cyclists within and outside of the site.
3. It is unacceptable to assume that that the crossroad junction and other improvements proposed for the Old Stowmarket Road South development (1636/16) have been completed before development work for this current application takes place. This application should contain its own proposals for road, footpath and cycle track improvements.

- 4.** Provision should be made for a revised junction at the crossroads suitable for the combined Old Stowmarket Road North and South developments possibly using land which is part this application.
- 5.** Traffic data appears to be flawed as does not include the addition traffic using the new car park at the rear of the Health Centre generated by vehicles for the school and Heath Centre itself.
- 6.** A commitment to carry out external road improvements before site work commences should be provided.
- 7.** The application should not be considered in isolation but as one of several at the application or pre-application stage which together could add some 700 homes to the existing 900 in Woolpit.
- 8.** The noise survey is flawed. Only continuous noise levels have been measured with no record of the levels resulting from 'single sound' events. Goldstar Transport, the operator of the adjacent lorry park and container storage depot has a record of problems resulting from 'single sound' events, particularly at night, when containers are being moved. Further measurement and a more comprehensive report is necessary. Reference must be made and consideration given to the numerous complaints that have been made by residents to MSDC Environmental Health over several years up to the present time about noise emanating from Goldstar Transport.
- 9.** There has been no public exhibition or community engagement for either application. This is particularly disappointing considering the importance of the site at the entrance to the village and its proximity to a Scheduled Monument. The public's views should be sought before the applications are considered.
- 10.** There is significant light pollution emanating from the Goldstar Transport site. A report on the effect of this on the proposed development should be provided before the application is determined.
- 11.** The application should include a minimum of 35% affordable homes.
- 12.** All brownfield sites within the district should be utilised for development before any further agricultural land is taken for development.
- 13.** The applicant in reports refers to Woolpit being a small town with large scale industrial sites in Old Stowmarket Road. This is absolutely not the case. Woolpit is a medium sized medieval village with great character and with many significant Listed Buildings. Old Stowmarket Road, particularly in the area of the application near Lady's Well, is still semi-rural in nature and not dominated by industry.

Your Ref: MS/4491/16  
Our Ref: 570\CON\3830\16  
Date: 25 May 2017  
Highways Enquiries to: christopher.fish@suffolk.gov.uk



**All planning enquiries should be sent to the Local Planning Authority.**  
Email: [planningadmin@babberghmidsuffolk.gov.uk](mailto:planningadmin@babberghmidsuffolk.gov.uk)

The Planning Officer  
Mid Suffolk District Council  
Council Offices  
131 High Street  
Needham Market  
Ipswich  
Suffolk  
IP6 8DL

**For the Attention of:** Mr J. Pateman-Gee

Dear John,

**TOWN AND COUNTRY PLANNING ACT 1990**  
**CONSULTATION RETURN MS/4491/16**

**PROPOSAL:** Change of use from agriculture to open space including a surface water management scheme and wildlife enhancement area  
**LOCATION:** Land North Of, Old Stowmarket Road, Woolpit, IP30 9QS  
**ROAD CLASS:** U

Notice is hereby given that the County Council as Highway Authority does not object subject to the imposition of the following conditions on any permission granted to the proposal:

Condition: Prior to the commencement of any part of the development, details of the proposed tree planting and landscaping including root management measures and of the proposed vehicular access for construction and maintenance of the site shall be submitted to and approved in writing by the Local Planning Authority and shall be carried out as approved.

Reason: In the Interests of highway safety, to prevent damage to adjacent roads and to ensure that visibility splays and street lighting remain unobstructed by proposed planting.

Condition: Before the development is commenced, details of the footpaths which shall be 3m wide, including layout connecting to Heath Road crossing locations, levels, gradients, surfacing and means of surface water drainage, shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the footpaths are constructed to an acceptable standard to accommodate cycling to promote sustainable transport.

**Comment:**

The site could equally be described as land east of Heath Road C436. It is proposed on drawing 200B to provide 'footpaths through grassland for improved access to 'Lady's Well' Scheduled Ancient Monument. It is recommended that these are constructed as 3m wide metalled cycle tracks. The details need to be considered in the round with highway improvements at the junction of Old Stowmarket Road/ Heath Road and The Street required further to MS/4489/16 and MS/1636/16 for development on land south of Old

Stowmarket Road, as the alignment shown does not connect to the footway on Heath Road at present. A gap in the path must not be permitted.

Similarly, at the north end of the path where it joins Heath Road there is no connecting footway to 'Lady's Well' and beyond. It is recommended in my response to MS/4489/16 that a footway/ cycle track is provided from the proposed site access off Old Stowmarket Road to Heath Road, north along the east side of Heath Road to a suitable crossing location and then north on the west side to Rectory Road to provide a sustainable transport link to the recreation ground, potential future development north of Woolpit and to amenities in Elmswell. The connection of the paths proposed on this application should be connected to suitable shared facilities on Heath Road such that the public may have safe access.

The site boundary is drawn against the edge of the carriageways shown indicatively for the adjacent proposal, which could cause problems. If this road were to be laid out to this design and dedicated as a public highway then abutting 1m wide strips of the site would be required as highway verge or possibly footway. Street lights may be required to be erected in this site too. Tree planting must be controlled to avoid damage to the proposed roads and to ensure an efficient street lighting design, and the safety benefits of street lighting, isn't compromised.

The adjacent proposal includes two cul-de-sacs linked by a footway abutting the site. It would be preferable to create a carriageway loop to avoid HGVs having to reverse creating a safety hazard and the extra vehicular traffic past plots 15-20. The intrusion of this site into the adjacent site between the cul-de-sac shown would mean the carriageway having to divert to avoid this.

Conversely, the turning head on the road accessing plot 1 is some 45m from the end of the road and 'intrudes' into this site. The County Council would not wish to adopt the road where it serves five or fewer dwellings (with little chance of this being increased in the future). A minimum length of 11m beyond the turning head would be required to meet Suffolk Design Guide Type D standard. Therefore, with the turning arm as shown, plots 1-3 would be served by a private drive. The side arm is not long enough at approximately 12m from the north kerb; it should be 14m plus 2m overhang. Thus, the road would need to be realigned to avoid the arm intruding into this site.

Yours sincerely,

**Mr Christopher Fish**

Senior Highway Development Management Engineer  
Strategic Development – Resource Management

## Consultation Response Pro forma

<b>1</b>	<b>Application Number</b>	4489/16	
<b>2</b>	<b>Date of Response</b>	5.1.2017	
<b>3</b>	<b>Responding Officer</b>	Name:	Jonathan Duck
		Job Title:	Heritage and Design Officer
		Responding on behalf of...	Heritage Team
<b>4</b>	<b>Summary and Recommendation</b> (please delete those N/A)  Note: This section must be completed before the response is sent. The recommendation should be based on the information submitted with the application.	The Heritage Team does not support the scheme as it would not accord with the requirements of the LBA, the principles of the NPPF, or the Local Plan.	
<b>5</b>	<b>Discussion</b> Please outline the reasons/rationale behind how you have formed the recommendation. Please refer to any guidance, policy or material considerations that have informed your recommendation.	<p>This application seeks outline consent for the erection of up to 79 dwellings on land to the north of Old Stowmarket Road, and east of Heath Road, in Woolpit.</p> <p>The heritage team issues of concern include the impact of the scheme on the Lady's Well SAM to the north west of the site, the Grade I listed church to the west of the site, and the undesignated Saffron House, located to the south of the site, on the southern side of Old Stowmarket Road, close to the proposed access road.</p> <p>HE have provided a detailed response to the outline application, which in recommendation states that the application be withdrawn and additional information be submitted, on the basis that the density currently proposed would impact harmfully on the setting of the assets. HE also requested increasing the open space provision around the SAM.</p> <p>The Heritage Team view concurs with that of HE in regard to the requirement to increase the open space around the east of the monument, to ensure a semblance of the former setting is preserved, which would help maintain historical and aesthetic conservation values. However, the Heritage Team disagrees with the HE assertion that the development site 'is still recognisable as the outer edge of the village'. It is a development of up to 79 houses of a linear, suburban form and disposition, as seen against the western edge of the site, and on the eastern edge of the village. It does <i>not</i> appear as the</p>	

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		<p>edge of the village.</p> <p>The Heritage Team also does not agree with the applicant's Heritage Statement, which considers one of the benefits of the development the creation of 'an open space, [and] a wildflower meadow or green, to the south of the monument'. This is non-sensical. The SAM is currently tucked into the north western corner of a large field, with the remainder of the arable land to both east and south currently open. By impinging upon this land significantly to the east – and by landscaping it to the south – does not – and cannot - constitute the positive creation of an 'open space', particularly as HE observed that the setting of the SAM was important and that it had originally been sited in relative isolation, at the edge of the village in a rural, agricultural landscape.</p> <p>The Heritage Statement also suggests another benefit of the scheme would be in the creation of new views towards the church spire. However there are currently myriad views from the field which is to be engulfed by this development. By building over much of it, and thereby limiting views of the spire from the site, it appears the agent is suggesting those remaining views would in some way 'showcase' the spire. This is similarly non-sensical and arguably diminishes the value of the Heritage Statement.</p> <p>The Heritage Team view is that the development would adversely affect the significance of the church, and the SAM. In terms of the LBA the development would neither preserve nor enhance the setting of the listed buildings, (s.66) nor the character and appearance of the adjacent CA, (s.72). In terms of the NPPF, the development would be less than substantially harmful but, as HE suggest, the level of harm to the Grade I church and the CA would be 'low to moderate', whereas the harm to the SAM would be 'moderate to high'. (The effect on the undesignated Saffron House to the south is low to moderate).</p> <p>It is for these reasons the Heritage Team does not support the proposal.</p>
6	<p><b>Amendments, Clarification or Additional Information Required</b> (if holding objection)</p> <p>If concerns are raised, can they be overcome with</p>	<p>Substantial reconsideration of the density and layout of the scheme is required.</p>

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	changes? Please ensure any requests are proportionate	
7	<b>Recommended conditions</b>	

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Resource Management  
Bury Resource Centre  
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IP32 7AY

Philip Isbell  
Corporate Manager - Development Manager  
Planning Services  
Mid Suffolk District Council  
131 High Street  
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Web: <http://www.suffolk.gov.uk>

Our Ref: 2016\_4491  
Date: 29 November 2016

For the Attention of John Pateman-Gee

Dear Mr Isbell

**Planning Application 4491/16– Land north of Old Stowmarket Road, Woolpit:  
Archaeology**

The large proposal affects an area of very high potential recorded in the County Historic Environment Record. It is immediately adjacent to the Scheduled Medieval Lady's Well moated site and possible holy well (WPT 002). The medieval church of St Edmunds is located less than 200m to the west of the proposed development area and as well as medieval and post-medieval finds having been recorded from the site itself (WPT 044 and 045), a number of finds of prehistoric, Roman and medieval date have also been located within the vicinity (WPT 007 and 017). Recent archaeological investigation immediately opposite to the proposal area have also recorded remains of prehistoric date (WPT 054). As a result of this potential, the large scale of the proposal and the fact that the site has not previously been the subject of any systematic archaeological investigation, there is a high probability of encountering archaeological remains at this location. The proposed scheme will involve groundworks which will damage or destroy any surviving archaeology.

Given the high potential and lack of previous investigation, I recommend that, in order to establish the full archaeological implications of this area and the suitability of the site for the development, the applicant should be required to provide for an archaeological evaluation prior to the determination of this planning application, to allow for preservation *in situ* of any sites of national importance that might be defined (and which are still currently unknown). This large area cannot be assessed or approved in our view until a full archaeological evaluation has been undertaken, and the results of this work will enable us to accurately quantify the archaeological resource (both in quality and extent). This is in accordance with paragraphs 128 and 129 of the National Planning Policy Framework as is consistent with the advice provided to the applicant during pre-application consultations.

Decisions on the suitability of the site, and also the need for, and scope of, any further work should there be any below-ground archaeological finds of significance, will be based upon the results of the evaluation.

In this case, a trial trenched archaeological evaluation will be required to establish the potential of the site. The results of the evaluation must be presented with any application submitted for the site, along with a detailed strategy for further investigation and appropriate mitigation. The results should inform the development to ensure preservation *in situ* of any previously unknown nationally important archaeological remains within the development area.

The Conservation Team of the Suffolk County Council Archaeological Service would be pleased to offer guidance on the archaeological work required and will, on request, provide a brief for each stage of the archaeological investigation. Please see our website for further information on procedures and costs: <http://www.suffolk.gov.uk/archaeology>

Historic England should also be consulted at the earliest opportunity regarding the potential setting impacts of this proposal upon the adjacent Scheduled Ancient Monument.

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Rachael Abraham

Senior Archaeological Officer  
Conservation Team

John Pateman-Gee  
Planning Department  
Mid Suffolk District Council  
131 High Street  
Needham Market  
IP6 8DL

06/12/2016

Dear John,

**RE: 4491/16 Change of use from agriculture to open space including a surface water management scheme and wildlife enhancement area. Land North of Old Stowmarket Road, Woolpit**

Thank you for sending us details of this application, we have the following comments:

We note that this application is related to the residential development being proposed under planning application reference 4489/16, on land to the east of this site, we have provided separate comments on that proposal. With regard to this application, it is understood that the site is currently part of an arable field and therefore there is the potential to provide significant ecological enhancements as part of this proposal. We recommend that a plan is produced detailing the ecological enhancements to be provided and that the implementation of this plan is secured by condition, should consent be granted. The ecological enhancement plan should include the following:

- Details of the design of the proposed ponds, which should be in accordance with published best practice guidance (the Great Crested Newt Conservation Handbook (Froglife, 2001) and the Amphibian Habitat Management Handbook (ARC, 2011));
- Details of the terrestrial habitat to be created (including tree and shrub planting), any planting should use native species of local provenance;
- A long-term habitat management plan must be secured as part of any consent. This should include an appropriate financial contribution being secured to cover the long-term management of the site and should maximise the site's biodiversity value.

It is also noted that the site is adjacent to an existing waterbody, the moat within Lady's Well, which is known to support great crested newts (report accompanying planning application 4489/16). It must therefore be ensured that any new ponds created do not impact on water availability at the adjacent site.

We would be happy to provide further comments on a habitat management plan for the site when one is available.

If you require any further information, please do not hesitate to contact us.

Yours sincerely

Jill Crighton  
Conservation Planner

**From:** Philippa Stroud  
**Sent:** 23 November 2016 16:51  
**To:** Planning Admin  
**Cc:** John Pateman-Gee  
**Subject:** 4491/16/FUL Land north of Old Stowmarket Road, Woolpit IP30 9QS - Land Contamination

WK/186526

**Ref: 4491/16/FUL EH – Land Contamination**  
**Location: Land North of Old Stowmarket Road, Woolpit IP30 9QS**  
**Proposal: Change of use from agriculture to open space including a surface water management scheme and wildlife enhancement area**

Thank you for the opportunity to comment on the above planning application.

I have no objection to the proposed change of use from the perspective of land contamination. I would only request that we are contacted in the event of unexpected ground conditions being encountered during construction and that the developer is made aware that the responsibility for the safe development of the site lies with them.

Regards,

Philippa Stroud  
Senior Environmental Protection Officer  
**Babergh and Mid Suffolk District Councils - Working Together**

Telephone: 01449 724724

# Consultee Comments for application 4491/16

## Application Summary

Application Number: 4491/16

Address: Land North of Old Stowmarket Road, Woolpit IP30 9QS

Proposal: Change of use from agriculture to open space including a surface water management scheme and wildlife enhancement area

Case Officer: John Pateman-Gee

## Consultee Details

Name: Mr Robert Boardman (Stowmarket Ramblers)

Address: 8 Gardeners Walk, Elmswell, Bury St Edmunds IP30 9ET

Email: bob@gardeners8.plus.com

On Behalf Of: Ramblers Association - Bob Boardman (temp cover)

## Comments

I have viewed these plans and I do not have any comment or observations to make.