

Eastwick Farm, Clay Lane, Stoke Ash, Eye, Suffolk IP23 7DZ

Heritage Statement

Ref: 1135.0102/04/2023

April 2023

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Contents

Contents	iii	
Figures	v	
Executive summary	1	
<u>1</u>	<u>Introduction</u>	<u>2</u>
1.1	Origin and scope of the report	2
1.2	Designated Heritage Assets	2
1.3	Conservation Area	3
1.4	Nearby Designated Assets	3
1.5	Non-designated assets (NDA)	3
1.6	Setting	3
1.7	Aims and objectives	3
<u>2</u>	<u>Site and Environs</u>	<u>5</u>
2.1	Site	5
2.2	Designated Heritage Assets	5
2.3	Conservation Area	5
2.4	Non-designated assets	6
2.5	Setting	6
<u>3</u>	<u>Significance</u>	<u>7</u>
3.1	Planning History	7
3.2	Statement of significance	7
<u>4</u>	<u>Impact of Development</u>	<u>8</u>
4.1	Site in general	8
4.2	Other designated assets	9
4.3	Non-designated assets	9
4.4	Setting	9
4.5	Commentary	9
4.6	Harm	10
4.7	The Duty to Preserve or Enhance	10
<u>5</u>	<u>Photos</u>	<u>11</u>
5.1	External	11
5.2	Internal	12
<u>6</u>	<u>Impact of Proposed Development</u>	<u>14</u>
6.1	Site	14
6.2	Designated assets	14
6.3	Non-designated assets	14
6.4	Setting	14
6.5	Commentary	14
6.6	Harm	15
<u>7</u>	<u>Conclusions and Recommendations</u>	<u>16</u>
7.1	Conclusions	16

7.2	Recommendations	16
<u>8</u>	<u>Planning Framework</u>	<u>17</u>
8.1	Statutory protection	17
8.2	National Planning Policy Framework	17
8.3	Local Policy	19
<u>9</u>	<u>Determining significance</u>	<u>21</u>

Figures

Fig 1 Site (CPSL/Client 2023).....	4
Fig 2 Nearby Assets.....	4
Fig 3 Photo (Client).....	6

Note: Site outlines may appear differently on some figures owing to distortions in historic maps. North may not be up the page and is generally approximate on early maps.

Unless otherwise noted, figures are not shown to scale.

Executive summary

We are instructed by Sedgwick International on behalf of Clients to prepare a Heritage Statement in relation to development at Eastwick Farm, Clay Lane, Stoke Ash, Eye, Suffolk IP23 7DZ.

This desk-based study assesses the possible impacts of the proposed development on built and other heritage assets in the area.

Designated built heritage assets which may be affected comprise:

- The site is nominally in the curtilage of a listed building - a designated asset.*
- The site is not in a Conservation Area.*

Nearby designated assets include:

- The site is within a complex including other listed buildings.*

These assets will not be affected and have been scoped out of consideration.

There are listed buildings in the area, any of which may be affected by development as part of the significance of their group value. Other assets/NDAs may exist nearby.

Conclusions

- The subject building is the curtilage building to a designated heritage asset; listed building Grade II.*
- The site is not a NDA.*
- The proposal will have no physical impact on the significance of the host designated asset and cause no harm.*
- In the round the impact on the subject asset will be neutral.*
- The proposal will have no impact on the significance of any NDA and cause no harm.*
- It is considered that the development will not impact on the contribution that setting makes to the significance of nearby assets and there will be no harm.*
- By virtue of intervening landscape and suburban forms, relative disposition, lack of inter-visibility and absence of causal links, it is considered that the setting of other designated and non-designated assets will be materially unaffected by the main scheme. There will be no harm to significance.*
- The proposal is considered to accord with legislation, national and local heritage policy and advice.*

Recommendations

Prior to the dismantling of the building a WSI and HE Level III recording of the building and its immediate environs is required.

A watching brief will be required, during both the dismantling of the building and its reassembly.

Mark Strawbridge MRTPI IHBC FRSA

FPHS

1 Introduction

1.1 Origin and scope of the report

- 1.1.1 We are instructed by Sedgwick International on behalf of Clients to prepare a Heritage Statement in relation to development at Eastwick Farm, Clay Lane, Stoke Ash, Eye, Suffolk IP23 7DZ, in Mid-Suffolk District Council area.
- 1.1.2 The subject building has in the past suffered considerable storm damage and is considered to be beyond stabilisation or reasonable repair. The proposal is in three stages:
1. To undertake a detailed recording of each element;
 2. To undertake a full dismantling of the building; and
 3. Reusing the existing repaired or reinstated timbers, to rebuild the barn, rectifying the lack of verticality in the process.
- 1.1.3 This desk-based study assesses the impact of the scheme on built heritage assets (standing buildings). It forms an initial stage of investigation of the area of proposed development (hereafter referred to as the 'site') and may be required in relation to the planning process in order that the local planning authority (LPA) can formulate an appropriate response in the light of the impact upon any known or potential heritage assets. These are parts of the historic environment which are considered to be significant because of their historic, evidential, aesthetic and/or communal interest.
- 1.1.4 The assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (DCLG 2021) and to standards specified by the Institute for Archaeologists (ClfA Oct 2012/Nov 2012), English Heritage (2008, 2011), Historic England (2015) and the Institute of Historic Building Conservation (IHBC 2009). The LPA has referred the applicant to the HER database.
- 1.1.5 Note: within the limitations imposed by dealing with historical material and maps, the information in this document is, to the best knowledge of the author, correct at the time of writing.

1.2 Designated Heritage Assets

- 1.2.1 The site is curtilage listed and therefore a designated heritage asset.
- 1.2.2 The list description for the main house states:
Listing ID: 1180993 Grade II
Former farmhouse. In 2 sections: to east, part of a C15 house, now considerably altered; at right angles to south is a mid C16 2-cell range. Restored mid 1960's. Timber framed and plastered; main range is thatched, the earlier wing glazed black pantiled. 2 storeys and attic and 1½ storeys. 2 windows, 3 and 4-light casements with horizontal glazing bars. Small original upper window has moulded mullions. Lobby entrance: gabled porch of colourwashed brick with 6-panel door, the upper 4 panels glazed. Stack has original axial shaft. Small thatched addition on north gable end. Earlier wing has similar casement windows. Interior. Some good heavy studding in main range, which has been carefully restored. North room on ground floor has chamfered floorbeam and closely-spaced chamfered joists; there is a fine original 5-light window, the mullions with roll and cavetto moulding. There is a similar but slightly damaged window in the room above. South room has roll-moulded floorbeam, the joists concealed. Original doorways into both rooms with heavy shallow-arched heads. One upper room has a fine ceiling, all components with a single roll moulding. The stack is an early C17 rebuilding, slightly larger than the original. Pine newel stair to upper floor. Queen- post roof. C15 work comprises service bay and most of lower bay of former open hall: heavy studs, quite widely-spaced, with evidence for cross-entry doorways. All but 2 of joists in service cell

removed mid C20. Evidence for square-headed service doorways with ogee-moulded surrounds. Inserted floor has massive cross-beams and closely-spaced chamfered joists. Roof is C18 or C19 replacement. Remainder of this range lost early C20. The existence of 2 substantial C15-C16 dwellings at right angles is unusual and it is likely that one range was a unit house.

1.2.3 The barn is not referred to in this or any other listing.

1.3 Conservation Area

1.3.1 The site is not within a Conservation Area (CA)

1.4 Nearby Designated Assets

1.4.1 The following are nearby:

Grade II (ID: 1032258) OLLY DALE

Grade II (ID: 1284790) WAYSMEET

Grade II (ID: 1285155) GARDINER'S HALL

Grade II (ID: 1032257) GARDINER'S COTTAGE

1.4.2 Due to relative disposition and lack of inter-visibility these and other assets have been scoped out of consideration.

1.5 Non-designated assets (NDA)

1.5.1 The LPA maintains a separate list of NDAs – these have been scoped out of consideration.

1.6 Setting

1.6.1 Setting in this case is contiguous with the group and comprises the enclosed nature of the built form; there is nothing so suggest that appropriate change will be harmful, as a principle.

1.7 Aims and objectives

- Identify the presence of any built heritage assets that may be affected by the proposals;
- describe the significance of such assets, as required by national planning policy;
- assess the likely impacts upon the significance of the assets arising from the proposals; and
- provide recommendations for further assessment where necessary of the historic assets affected, and/or mitigation aimed at reducing or removing completely any adverse impacts upon heritage assets and/or their setting.

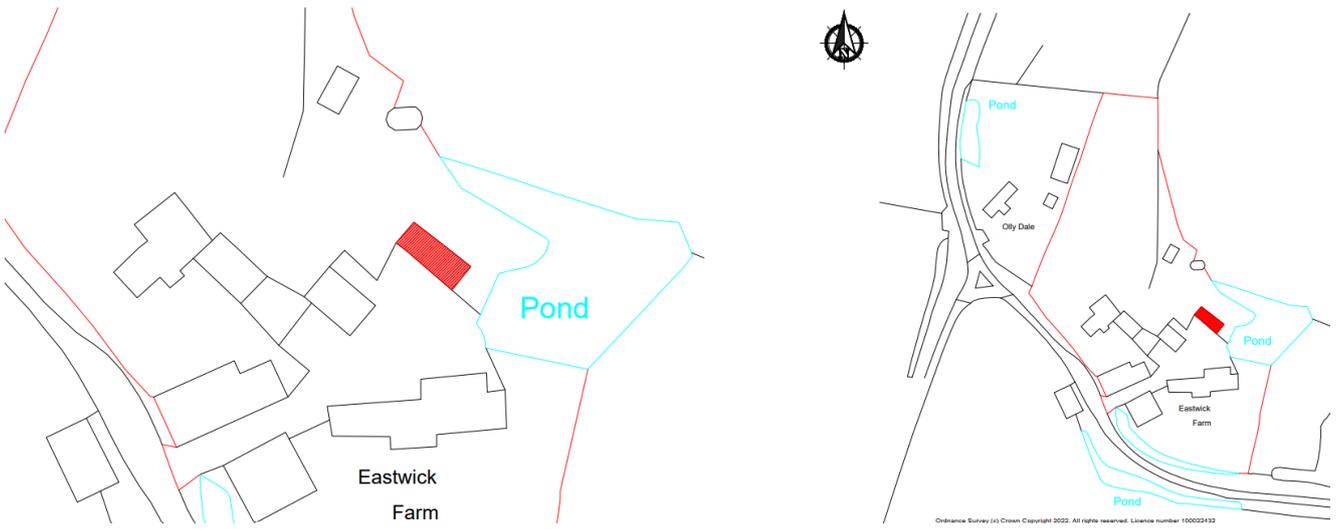


Fig 1 Site (CPSL/Client 2023)



Fig 2 Nearby Assets
LBs shown in BLUE

2 Site and Environs

2.1 Site

- 2.1.1 Situated on the north-west side of the pond east of the main house, the subject site appears as part of the group with the host building.
- 2.1.2 The barn is within the contemporary ownership curtilage of Eastwick Farm; the original functionality reflects the historic buildings related to the farm complex.
- 2.1.3 The site and environs have been subject to change through time.
- 2.1.4 The building comprises a single-storey with loft traditional farm building with a mixture of materials of different ages and quality, including 'shiplap' boarding and render over laths, on an irregular brick plinth. The roof is corrugated fibrous material dating from the mid-20th century.
- 2.1.5 As can be seen from Fig 3 and the photographs below the barn is poor condition and is showing signs of potential collapse.
- 2.1.6 Internally, the building is open and fully framed with a mixture of timbers - some unhewn; some sawn with a few much later additions.

2.2 Designated Heritage Assets

- 2.2.1 The building is within the curtilage of the listed building and therefore it needs to be treated as curtilage listed. It is therefore a designated heritage asset.
- 2.2.2 Fig 2 shows the relative disposition of nearby LBs to the site.
- 2.2.3 By virtue of inter Intervening rural and suburban forms, relative disposition, lack of inter-visibility and absence of causal links, it is considered that other designated and non-designated assets will be materially unaffected by the proposed scheme.

2.3 Conservation Area

- 2.3.1 The site is not within a conservation area (CA).



Fig 3 View (Client 2021)

2.4 Non-designated assets

2.4.1 The site is not a NDA.

2.4.1 NDAs in the vicinity have been scoped out of consideration as the proposed works are minimal and there will be no potential for permanent impact on the setting of any other asset.

2.5 Setting

2.5.1 Setting is generally taken to mean 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. (NPPF 2021 Glossary).

2.5.2 A setting is not an asset in its own right, nor does it have significance unless part of another heritage designation.

2.5.3 The contribution of setting is generally considered with reference to the Historic England document Good Practice Advice in *Planning Note 3 The setting of heritage assets* (3rd edition 2020) (GPA3).

2.5.4 By virtue of intervening landscape and other forms it is difficult to view this building in conjunction with other assets outside the group but within the locality. On account of this it is considered that there will be no impact on either the character and appearance of the host listed building or other assets; the contribution of setting to the significance of the curtilage that listed building is minimal.

2.5.5 Wider views are precluded by the landscape form; proximate views within and the prospect from the asset and will remain materially unaltered.

3 Significance

3.1 Planning History

3.1.1 A review of the LPA website reveals the following:

- Application for Listed Building Consent - Erection of two storey extension
Application. No: DC/21/02802 | Received: Thu 13 May 2021 | Validated: Fri 14 May 2021 | Status: Refused
- Householder application - Erection of two storey extension
Application. No: DC/21/02801 | Received: Thu 13 May 2021 | Validated: Fri 14 May 2021 | Status: Refused

3.1.2 The barn was not part of either of these applications.

3.2 Statement of significance

3.2.1 The determination of the significance of historic assets is based on statutory designation and/or professional judgement against 4 'values' (English Heritage/Historic England - 2008/2015) restated in the advice document *GPA 2 - Managing Significance in Decisions*

3.2.2 The 4 values are:

- Evidential value
- Aesthetic value
- Historical value
- Communal value

(This is refined by National Planning Policy Guidance (PPG), last updated in July 2021).

3.2.3 The site is part of a designated heritage asset.

3.2.4 The main house LB is listed Grade II and as such is of **high significance**, as a baseline. The subject barn building has evidential/historical value, as part of the group of related buildings; and reasonable aesthetic value (albeit largely due to its tumbledown nature). Communal value is not well represented although one might argue that being part of the food production of an area is some degree of communal importance.

3.2.5 The building has been the subject to change over time; its significance has remained unharmed. There is nothing to suggest that a watershed has been reached.

3.2.6 The setting of a building is not a heritage asset itself and hence is of no significance. It is contended that setting in itself makes little visual contribution to significance of assets in this case and concluded that setting in these terms is not vulnerable to change or harm.

4 Impact of Development

4.1 Site in general

- 4.1.1 The development is as described in the drawing pack submitted with the application.
- 4.1.2 Due to the overall state of the building and the storm damage to it, it is neither practicable nor viable to stabilise it in situ. The proposal will result in a new building, albeit comprising reclaimed, reused and repurposed materials from the original building.
- 4.1.3 It is considered in the round that this solution is preferable to the most likely alternative.
- 4.1.4 The proposed reuse is compatible with the site's location.
- 4.1.5 The 'design' is appropriate in scale and landscape terms.
- 4.1.6 The development is in keeping with the area in term of functionality and proportionality.
- 4.1.7 After a period of time when the new and reused materials will have become weathered, there will be no material change to the external appearance of the barn.

The drawing pack consists of two main columns of architectural drawings. The left column shows existing conditions, while the right column shows proposed changes. Each column includes:

- External elevations (North, South, East, West) for both existing and proposed buildings.
- Internal elevations (North, South, East, West) for both existing and proposed buildings.
- Structural sections (North-South and East-West) for both existing and proposed buildings.

At the bottom of each column is a location plan showing the site's context within the Eastwick Farm area, including a pond and surrounding buildings. A north arrow is provided for each plan.

GENERAL NOTES
Scale 1:100
Date 1/2022

CHORD SPACE SOLUTIONS LTD
CLIENT: Stevens
SITE ADDRESS: Eastwick Farm, Clay Lane, Stoke Ash Eye, IP23 7DZ
PROJECT: TBC ref no
DRAWING TITLE: Existing and Proposed External and Internal Elevations, Block and Location Plan
ISSUED DATE: 30th Aug 2022
SCALE: 1:100, 1:500 and 1:1250
OUR REFERENCE: 2207-2-010
DRAWING BY: RS
DRG SIZE: A1
DRG No: 001
Rev: A



Fig 4 Scheme (CSSL 2023)

4.2 Other designated assets

- 4.2.1 It is considered that the proposed development will have no material impact on the significance of any other designated historic asset.
- 4.2.2 Other assets in the vicinity have been scoped out of consideration. There will be no harm to any nearby designated heritage asset nor its setting attendant on the development proposed.

4.3 Non-designated assets

- 4.3.1 The site is not a NDA.
- 4.3.2 Nearby NDAs/locally listed buildings are scoped out. There will be no harm to significance of any other asset.

4.4 Setting

- 4.4.1 The scheme will not impact at all on setting.
- 4.4.2 By virtue of lack of intervisibility, relative disposition and intervening landscape and suburban forms, the development will not be within and therefore have no material impact on the setting of the other LBs or NDAs in the vicinity and no harm will be caused to significance.

4.5 Commentary

- 4.5.1 There has been change over time in the area and on the site - clearly the significance of the asset remains unharmed; there is nothing to suggest that a watershed has been reached. The development subject to this application does not take on-going change beyond the tipping point.

4.5.2 Change is part of the character of most long-standing farm groups as is the case here.

4.6 Harm

4.6.1 The NPPF, at paras 201 & 202, refers to harm to the significance of designated heritage assets. At para 203 it refers to NDAs.

4.6.2 The recording of the building will better reveal the significance of this particular asset; dismantling will be of harm to significance but the watching brief will lead to further understanding of the construction and value of the building in historic terms. Stabilising the base and reconstructing the barn using renovated and repurposed materials will go a long way to offsetting the harm overall. If considered in the round, it is thought that the impact of the development on the significance of this particular asset will be neutral.

4.6.3 In this case if taken in the round, it is considered that the proposal will cause no harm to significance of any asset; there will be change, but overall that change will be in the positive and better reveal the significance of the assets. As there is no harm there is no duty to prove public benefit, etc.

4.6.4 It is considered in the round that this solution is preferable to the most likely alternative which is the continued decline and eventual loss of the building in its entirety.

4.7 The Duty to Preserve or Enhance

4.7.1 The site is not in a CA; there is no duty to 'preserve and enhance'.

5 Photos

5.1 External

5.1.1 The following photos are supplied by the Client.



P1



P2



P3

5.1.2 The poor state and the nature of change over time is evident in these photos.

5.2 Internal



P4



P5

5.2.1 The 'make do and mend' character of the build is evident from these photos.

6 Impact of Proposed Development

6.1 Site

- 6.1.1 The proposal constitutes detailed recording, dismantling with watching brief and reconstruction utilising reclaimed and repurposed materials.
- 6.1.2 It is considered in the round that this solution is preferable to the most likely alternative which is the continued decline and eventual loss of the building in its entirety, without any concomitant or compensatory benefit through the use of heritage materials.
- 6.1.3 The proposed use is compatible with the site's location.
- 6.1.4 The design is appropriate in scale and townscape terms.
- 6.1.5 The development is discrete and in keeping with this part of the area in term of functionality and proportionality.

6.2 Designated assets

- 6.2.1 The proposed development will have no physical impact on the host asset or any other designated historic asset nearby
- 6.2.2 Other assets in the vicinity have been scoped out of consideration. There will be no harm to any nearby designated heritage asset nor its setting attendant on the development proposed.

6.3 Non-designated assets

- 6.3.1 The site is not a NDA.

6.4 Setting

- 6.4.1 As discussed above, the setting currently makes no contribution to the significance of the designated assets nearby and as such is neutral. The scheme does not impact at all on character and appearance of assets.
- 6.4.2 By virtue of lack of intervisibility, relative disposition and intervening urban and suburban forms, the development will not be within and therefore have no material impact on the setting of the other LBs or NDAs in the vicinity and no harm will be caused to significance.

6.5 Commentary

- 6.5.1 The development will cause no harm to the significance of any other asset. It will be compatible with and therefore preserve the integrity of the host listed building. By virtue of sustaining a beneficial use the development will have a positive impact, representing an enhancement.
- 6.5.2 By virtue of greater visual and experiential access significance will be better revealed.
- 6.5.3 There has been change in the area and on the site; there is nothing to suggest that a watershed has been reached. The development subject to this application does not take on-going change beyond the tipping point.
- 6.5.4 Change is part of the character of most long-standing farm buildings as is the case here.

6.6 Harm

- 6.6.1 The NPPF, at paras 201 & 202, refers to harm to the significance of designated heritage assets. At para 203 it refers to NDAs.
- 6.6.2 Para 197 states that, in determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.
- 6.6.3 In order to put the subject building back into viable use it would be necessary to dismantle the building in its entirety, change the foundations, bring the building up to a reasonable standard of occupational environment, insert services and other infrastructure and furnish accordingly. It is likely that the process would effectively destroy that which required conservation.
- 6.6.4 The recording process, watching brief through dismantling and reconstruction and the opportunity to inspect sub-ground whilst the work was progressing and up to a contribution to furthering knowledge of this type of building, retaining its essence in the archive and thereby better revealing the significance of the asset. This would constitute the community benefit and a positive contribution.
- 6.6.5 The process of recording, dismantling and repurposing could be seen as an exemplar in terms of new development making a positive contribution to local character and distinctiveness.
- 6.6.6 In this case it is considered that the proposal will cause no harm to significance of the host asset and have neutral impact on the significance of the subject asset - there will be change, but overall that change will be in the positive and better reveal the significance of the assets.

7 Conclusions and Recommendations

7.1 Conclusions

- 7.1.1 The subject building is the curtilage building to a designated heritage asset; listed building Grade II.
- 7.1.2 The site is not a NDA.
- 7.1.3 The proposal will have no physical impact on the significance of the host designated asset and cause no harm.
- 7.1.4 In the round the impact on the subject asset will be neutral.
- 7.1.5 The proposal will have no impact on the significance of any NDA and cause no harm.
- 7.1.6 It is considered that the development will not impact on the contribution that setting makes to the significance of nearby assets and there will be no harm.
- 7.1.7 By virtue of intervening landscape and suburban forms, relative disposition, lack of inter-visibility and absence of causal links, it is considered that the setting of other designated and non-designated assets will be materially unaffected by the main scheme. There will be no harm to significance.
- 7.1.8 The proposal is considered to accord in full with legislation, national and local heritage policy and advice.

7.2 Recommendations

- 7.2.1 Prior to the dismantling of the building a WSI and HE Level III recording of the building and its immediate environs is required.
- 7.2.2 A watching brief will be required, during both the dismantling of the building and its reassembly.

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8 Planning Framework

8.1 Statutory protection

Listed Buildings and Conservation Areas

- 8.1.1 The *Planning (Listed Buildings and Conservation Areas) Act 1990* sets out the legal requirements for the control of development and alterations which affect buildings, including those which are listed or in conservation areas. Buildings which are listed or which lie within a conservation area are protected by law. Grade I are buildings of exceptional interest. Grade II* are particularly significant buildings of more than special interest. Grade II are buildings of special interest, which warrant every effort being made to preserve them.

8.2 National Planning Policy Framework

- 8.2.1 The Government issued the National Planning Policy Framework (NPPF) in March 2012 (DCLG 2012) and supporting Planning Practice Guidance in 2014 (DCLG 2014). This advice was updated in 2021.
- 8.2.2 One of the 12 core principles that underpin both plan-making and decision-taking within the framework is to '*conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.*' It recognises that heritage assets are an irreplaceable resource and requires the significance of heritage assets to be considered in the planning process, whether designated or not. The contribution of setting to asset significance needs to be taken into account.
- 8.2.3 Section 16: *Conserving and enhancing the historic environment*, is key. The policies set out in this section relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to plan-making and decision-making. (See also Planning Practice Guidance – Conserving and enhancing the historic environment section).
- 8.2.4 Paras 189 – 208 inclusive refer:

189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

(Some World Heritage Sites are inscribed by UNESCO to be of natural significance rather than cultural significance; and in some cases they are inscribed for both their natural and cultural significance).

190. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

191. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

192. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

193. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

8.2.5 Proposals affecting heritage assets are considered under para 194 on:

194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

196. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

197. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

198. In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

8.2.6 Potential impacts are considered in para 199 on:

199. 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.

200. 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 scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

(Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.)

201. 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.

202. 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.

203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

204. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

205. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

(Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository).

206. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, 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.

207. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 200 or less than substantial harm under paragraph 201, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

208. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

8.3 Local Policy

- 8.3.1 Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the Development Plan unless material considerations indicated otherwise.
- 8.3.2 The LDS timetable states that a Natural and Historic Environment SPD will be adopted in 2024: <https://www.midsuffolk.gov.uk/assets/Strategic-Planning/JLPExamination/Babergh-and-Mid-Suffolk-Joint-Local-Development-Scheme-2022-2025.pdf>.
- 8.3.3 Until then, it appears the council are still using the Mid Suffolk Local Plan 1998 (https://localplan.midsuffolk.gov.uk/plan_index.htm), as a refusal for an application in 2021 for Listed Building Consent - Erection of two storey extension (No: DC/21/02802) quoted the following relevant policies:

SUMMARY OF POLICIES WHICH ARE RELEVANT TO THE DECISION:

NPPF - National Planning Policy Framework

FC01 - Presumption In Favour Of Sustainable Development

FC01_1 - Mid Suffolk Approach To Delivering Sustainable Development

CS05 - Mid Suffolk's Environment

GP01 - Design and layout of development

H15 - Development to reflect local characteristics

H16 - Protecting existing residential amenity

H18 - Extensions to existing dwellings

HB01 - Protection of historic buildings

HB04 - Extensions to listed buildings

9 Determining significance

9.1.1 'Significance' lies in the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. Archaeological interest includes an interest in carrying out an expert investigation at some point in the future into the evidence a heritage asset may hold of past human activity and may apply to standing buildings or structures as well as buried remains. Known and potential heritage assets within the site and its vicinity have been identified from national and local designations, HER data and expert opinion. The determination of the significance of these assets is based on statutory designation and/or professional judgement against four values (EH 2008):

- *Evidential value*: the potential of the physical remains to yield evidence of past human activity. This might take into account date; rarity; state of preservation; diversity/complexity; contribution to published priorities; supporting documentation; collective value and comparative potential.
- *Aesthetic value*: this derives from the ways in which people draw sensory and intellectual stimulation from the heritage asset, taking into account what other people have said or written;
- *Historical value*: the ways in which past people, events and aspects of life can be connected through heritage asset to the present, such a connection often being illustrative or associative;
- *Communal value*: this derives from the meanings of a heritage asset for the people who know about it, or for whom it figures in their collective experience or memory; communal values are closely bound up with historical, particularly associative, and aesthetic values, along with and educational, social or economic values.

9.1.2 Table 1 gives examples of the significance of designated and non-designated heritage assets.

Table 1: Significance of heritage assets

Heritage asset description	Significance
World heritage sites Scheduled monuments Grade I and II* listed buildings English Heritage Grade I and II* registered parks and gardens Protected Wrecks Heritage assets of national importance	Very high (International/ national)
English Heritage Grade II registered parks and gardens Conservation areas Designated historic battlefields Grade II listed buildings Burial grounds Protected heritage landscapes (e.g., ancient woodland or historic hedgerows) Heritage assets of regional or county importance	High (national/ regional/ county)
Heritage assets with a district value or interest for education or cultural appreciation Locally listed buildings	Medium (District)
Heritage assets with a local (i.e., parish) value or interest for education or cultural appreciation	Low (Local)
Historic environment resource with no significant value or interest	Negligible
Heritage assets that have a clear potential, but for which current knowledge is insufficient to allow significance to be determined	Uncertain