

**THE SIX BELLS, FELSHAM, MID SUFFOLK**

**R P**  
HERITAGE

# **HERITAGE STATEMENT**

**Cordage 44 Ltd**

**CONTENTS**

1. INTRODUCTION	2
2. POLICY CONTEXT AND METHODOLOGY	3
3. HERITAGE ASSESSMENT	8
4. IMPACT ASSESSMENT	15
5. MITIGATION AND CONCLUSION	18

Appendices

Appendix A – Statutory List Descriptions

Appendix B - Heritage Assets Map

Appendix C - Plates

Appendix D - Local Planning Policies

Appendix E - Heritage Impact Assessment Methodology

Appendix F - Historic Map Progression

## 1. INTRODUCTION

- 1.1. This assessment, dated November 2023, has been prepared by RP Heritage, on behalf of Cordage 44 Ltd, in order to assess the impacts on the historic built environment arising from the proposed development of two detached dwellings on land to the rear of the Grade II listed The Six Bells PH, Felsham (the Site). Located on the northern side of Church Road, the Site comprises the Six Bells pub, an outbuilding running along the western boundary, a car-park serving the pub and a garden to the rear. A flint wall runs to the west of the pub demarking the western boundary and entrance to the car-park. Photographs of the Site and its surroundings can be found in Appendix C of this report.
- 1.2. In particular, the assessment considers the significance of the Grade II Six Bells PH, of the Grade II\* Church of St Peter, the Grade II Church Cottage and Swallows Nest, and that of the Felsham Conservation Area, and the potential impact on their significance from the proposed redevelopment of the Site.
- 1.3. There is a requirement under the National Planning Policy Framework (NPPF) (2019) for an applicant of development proposals to ascertain what constitutes the 'significance' of any heritage assets identified, what potential effects the development proposals will have on that heritage asset's significance, and how such effects would be mitigated.
- 1.4. The level of detail provided should be proportionate to the importance of each heritage asset, and no more than is sufficient to understand the potential impact that may arise from the development proposals.
- 1.5. In accordance with NPPF Paragraph 189, the Suffolk Historic Environment Record (HER) has been consulted providing further details of heritage assets identified within 250m of the Site's locality (Appendix B).
- 1.6. Reference should be made to the accompanying plans submitted as part of the planning application for technical detail. Other documents have been referred to in the writing of this report and should also form important background reading for the report. These include (but not exclusively) the list descriptions for nearby listed buildings, and both national and local government policy, contained within Appendices A and D respectively.
- 1.7. The amended design of this application has been informed by and takes account of the findings of the two previous appeals (in 2011 and 2022) as well as the refused application in 2023, whilst the findings of both of these two appeals and the application have also informed and provided a baseline for this updated Heritage Assessment.

## 2. POLICY CONTEXT AND METHODOLOGY

### Legislation

*Planning (Listed Buildings and Conservation Areas) Act 1990*

2.1. This 'Act' (as amended) outlines the provisions for designation, control of works and enforcement measures relating to Listed Buildings and Conservation Areas. Of relevance to the Site's development proposals are the following:

- Section 66(1) states that special regard shall be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses in considering whether to grant planning permission that affects a listed building or its setting.
- Section 72(1) states that in considering planning application for sites within a Conservation Area special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

### Local Policy and Guidance

- 2.2. The local planning context for the application is as set out in both the saved policies of the Mid Suffolk Local Plan (1998) and the Mid-Suffolk District Council's Core Strategy which was adopted by Council on September 2008, and which was subject of a focused review in December 2012.
- 2.3. The Local Plan contains one saved policy relating to listed buildings and their settings (HB1). The Core Strategy identifies "A better heritage for future generations" as one of its aims and objectives and contains two policies pertaining to heritage – CS2 and CS5.
- 2.4. The emerging Babergh and Mid Suffolk Joint Local Plan has been found sound and is scheduled for adoption shortly. Policy LP20 stipulates that all designated and non-designated heritage assets must be preserved, enhanced or conserved in accordance with statutory tests and their significance.
- 2.5. Mid Suffolk District Council prepared a Conservation Area Appraisal for the Felsham Conservation Area (2012), although as this is not an adopted document, as it states in its introduction, it presents a straightforward appraisal of Felsham's built environment in conservation terms, and is neither prescriptive nor overly descriptive, but more a demonstration of 'quality of place', sufficient for the briefing of the Planning Officer when assessing proposed works in the area.

2.6. Thus, in the absence of adopted local plan policies compliant with the NPPF, in line with paragraphs 212 and 213 of the NPPF, the decision-making process for this application should be led by the NPPF and the requirements set out within the Planning (Listed Buildings and Conservation Areas) Act 1990.

**National Planning Policy and Guidance**

*National Planning Policy Framework (2021)*

- 2.7. The NPPF sets out the Government’s national planning policies, including the conservation of the historic environment. Conserving 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, is one of twelve core planning principles underpinning plan-making and decision-taking.
- 2.8. The NPPF covers all aspects of the historic environment and heritage assets, including designated assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Conservation Areas, Registered Parks and Gardens and Registered Battlefields) and non-designated assets (local lists and archaeological sites of equivalent significance to scheduled monuments). The NPPF draws attention to the irreplaceable nature of heritage assets and the benefits their conservation can bring to the wider objectives of the NPPF in relation to sustainability, economic benefits and place-making (Paragraph 189).
- 2.9. The NPPF states that the significance of heritage assets (including their settings) should be identified, described and the impact of the proposal on the significance of the asset should be assessed. The planning application should include sufficient information to enable the impact of proposals on significance to be assessed. The NPPF sets a minimum information standard and states that the level of detail should be proportionate to the heritage asset’s significance and the potential impact on that significance (Paragraph 194).
- 2.10. The NPPF sets out the approach local authorities should adopt in assessing development proposals within the context of applications for development of both designated and non-designated assets. Great weight should be given to the conservation of designated heritage assets and the more important the asset, the more the emphasis that should be placed on its conservation. Harm or loss to significance through alteration or destruction or development within its setting should require clear and convincing justification (Paragraph 200).

- 2.11. Where there is substantial harm to or total loss of significance of a designated heritage asset, it must be demonstrated that this is necessary to achieve substantial public benefits that outweigh the harm or loss for local planning authorities (LPAs) to grant consent. Alternatively, it must be demonstrated that all of a set number of criteria are met (Paragraph 201).
- 2.12. Where there is less than substantial harm, the harm should be weighed against the public benefits of the development (Paragraph 202).
- 2.13. Additional guidance is given on new development within the settings of heritage assets. Proposals that preserve elements of the setting that make a positive contribution to or better reveal that significance of the heritage asset should be treated favourably (Paragraph 206).
- 2.14. Where loss of significance as a result of development is considered justified, the NPPF requires heritage assets to be recorded and understanding of the heritage assets to be advanced before they are partly or wholly lost in a manner proportionate to their importance and impact. The results of these investigations and the archive should be made publicly accessible. The ability to record evidence should not however be a factor in deciding whether loss should be permitted (Paragraph 205).

*Planning Practice Guidance*

- 2.15. The NPPF is supported by Planning Practice Guidance: Historic Environment (PPG, 2014) (amended July 2019). This provides further information on how to interpret and apply the NPPF in practice and the relationship to the legislative framework for planning and the historic environment. Relevant guidance to the Site’s development proposals includes:
  - Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.
  - Setting is the surroundings in which an asset is experienced, and may therefore, be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.
  - A thorough assessment on the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

- Views of and from an asset will play an important part in the way in which we experience an asset; its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.
- Harm to a heritage asset’s significance may arise from works to the asset or from development proposals within its setting.

*Historic Environment Good Practice Advice in Planning Notes*

2.16. Historic England’s Historic Environment Good Practice Advice in Planning Note 3 (GPA 3): The Setting of Heritage Assets (2<sup>nd</sup> Ed.) (2017) provides more detailed advice on how to approach setting assessments and expands upon the NPPF and the associated PPG. A five-step process is proposed for proportionate assessment of a heritage asset’s setting, of which the first four steps have been taken into account in preparing this Heritage Statement. These are set out in the Methodology section below.

**Methodology**

2.17. This Heritage Statement’s assessment of the identified heritage assets is in accordance with Historic England’s Historic Environment Good Practice Advice Note 3 (GPA 3): The Setting of Heritage Assets (2<sup>nd</sup> edition) (2017). The 5-step process set out in GPA 3 requires an analysis of a heritage asset’s ‘setting’, and the degree to which the setting contributes to that heritage asset’s ‘significance’. It also requires an assessment of how such a contribution, if any, may be altered by development proposals. This contribution can be positive, negative, or neutral. To inform this Setting Assessment, a proportionately-detailed assessment has been undertaken to fully understand the significance of the identified heritage assets.

2.18. Identifying the elements that constitute a heritage asset’s significance is outlined in English Heritage’s Conservation Principles, Policies & Guidance (2008): Evidential, Historical (illustrative or associative); Aesthetic; and Communal. Since its adoption, this document has been widely used by heritage professionals to establish the significance of heritage assets, connecting between their physical fabric and their respective settings.

- 2.19. The Conservation Principles, Policies & Guidance document is currently being updated to set out Historic England’s approach to conservation in a format that is more concise and aligns with the language of the NPPF and relevant legislation. This is to be achieved by recasting the understanding of significance to focus on the ‘Heritage Interests’ (Historic, Architectural, Archaeological and Artistic), whilst retaining reference to the four heritage values presented in the original document. The public consultation for this update has now closed. Once adopted, the new document will form the primary guidance for assessing what constitutes a heritage asset’s significance.
- 2.20. Both the NPPF Glossary and the British Standard Guide to the Conservation of Historic Buildings (BS 7913:2013) separately describe the term ‘significance’. The former states that the ‘heritage interest’ of a heritage asset derives from its archaeological, architectural, artistic or historic interests, with the latter citing a wide variety of attributes that may contribute to heritage interest. However, these are largely in accordance with, albeit more prescriptive, than those set out in Historic England’s established heritage values.
- 2.21. Therefore, for the sake of clarity, these documents each provide their own description of what constitutes significance, but as they are all in accordance with each other, the established heritage values set out in Conservation Principles, Policies & Guidance are used herein until an update of the Historic England guidance document has been adopted.
- 2.22. Professional judgment is used in conjunction with this guidance and methodology to undertake the assessment in this Heritage Statement.



### 3. HERITAGE ASSESSMENT

#### Historic Background

##### *Historical Development of Felsham*

- 3.1. The following provides an outline of the historical development of the Site and of Felsham. This assessment should be read in conjunction with the Plates and Figures sections of this report, in addition to the historic map progression in the Appendices.
- 3.2. Felsham, from its name, was the "home" of Faele: faele, in Saxon, meaning good or faithful. The settlement of Felsham was given to the Abbey of St. Edmundsbury by Earl Ulfketel, who was killed in 1016 in a battle between King Edmund Ironside and King Canute, at Ashdone, near Saffron Walden, in Essex.
- 3.3. Some-time before 1056 Felsham was transferred by the Abbey to the Saxon Aethelhun although later in the eleventh and twelfth centuries, Felsham was held of Thomas, Abbot of Bury, by Henry Strange, and his son and heir, Roger Strange, who also held other lands of the Abbey. The settlement was noted in the Domesday Book as being in the hundred of Thedwastre and within the county of Suffolk.
- 3.4. By 1550, the manors of Old Hall and "Broke" Hall were bought by William Risby, not long before his death in 1551 and who left the Manor of Felsham to his son, Thomas. The manor of Felsham remained in the possession of the Risby family till nearly the middle of the 18th century, when the male line died out, and the manors passed in the female line to the Fiskes and then to the Harrisons.
- 3.5. By 1885, the Ordnance Survey mapping (Historic Map 1) shows Felsham as a small village focused on what is now known as the upper green, with additional development to the east, around the lower green, with Felsham Hall and Maiden Hall sitting to the west of the principal settlement.
- 3.6. Little changes occur until the 1970s (Historic Map 4), when new development (now excluded from the conservation area boundary) is seen. Again, since then, there has been little overall change to Felsham and its surroundings.
- 3.7. The Six Bells is shown on the First Edition Ordnance Survey (Historic Map 7), where its footprint is largely similar to that today, although a rear wing projects from the third range, and the small square building to the rear of the first range has a further wing to the east. Various outbuildings are present within the courtyard, and the lack of walling

to the north of the remaining stables provides access to the land to the west.

- 3.8. This arrangement remains largely unscathed on the 1905 Ordnance Survey (Historic Map 8), although the opening in the wall appears to have been infilled. By 1975 (Historic Map 9), the majority of the outbuildings have disappeared, with only the stables remaining, whilst the rear wing to the third range has also been lost. No changes can be seen in the planform or the curtilage since then.

### Identification of Heritage Assets

- 3.9. Whilst the Six Bells PH is a Grade II listed building, the Church of St Peter, a Grade II\* church, and Church Cottage and Swallows Nest, a Grade II listed pair of cottages, lie within close proximity to the Site. Furthermore, the Site also lies within the Felsham Conservation Area. As such, this assessment will consider the impact of development on the setting and significance of these heritage assets, in line with the requirements of the legislative and policy framework.

Name	NHL Reference	Grade	Date Designated	Distance From Site
The Six Bells PH	1352348	II	18/04/1988	N/A
The Church of St Peter	1032627	II*	15/11/1954	85m
Church Cottage and Adjoining House Swallows Nest	1285415	II	18/04/1988	c.40m
Felsham Conservation Area	N/A	N/A	1996	N/A

Table 1: Heritage Assets considered within this assessment

### Description, Significance and Setting of Heritage Assets

#### *The Six Bells PH*

#### *Description*

- 3.10. The Six Bells is divided over three different ranges, with the outer left range sitting over two storeys, raised from a squared planform and sitting over two bays. The front façade is faced in dressed flint, with gault brick detailing to the windows and door, and with gault brick quoins. A raised gault brick string-course runs between ground and first floor. The western side elevation is faced in the same material, although there is only one

small modern window and a gault brick chimney stack. The ground floor has a large tripartite window to the left, containing 2/2, 8/8 and 2/2 lights, with the entrance door set within a timber portico to the side. The eastern side elevation, partially obscured by the second range, has a return of flint with brick quoins abutting the second range. Beyond, the wall is plain rendered. The hipped roof is covered in blue slate. Stylistically, this range dates from the early to mid-nineteenth century. To the rear is a single-storey brick building with pan-tiled roof, with a double timber door and three timber casement windows on the western elevation.

- 3.11. The second range, lying to the east of the first range, sits over two storeys with a side-sliding tripartite sash of 6, 6 & 6 light to the left hand side and a bay window to the right with each side having 6/6 timber sashes and a flat roof. At first floor, there are two modern side-hung casement windows, whilst the roof is covered in blue slate, with a stack to each end. The front façade is timber-framed, although the timber-framing has been plastered over, and the infill panels have twentieth-century pargetting. A single storey flat roofed extension lies to the rear.
- 3.12. The third range, lying to the east of the second range, sits over one storey, and has two 8/8 sash windows with a plain clay tiled roof. A two-storey rear wing lies to the rear, linking with the second range. A further single-storey extension sits to the rear of the third range.
- 3.13. A single-storey outbuilding runs along the western boundary, constructed in painted red brick with a pan-tiled gabled roof. The elevation facing into the car-park has a single ledged and braced timber door with large iron hinges, and two further stable doors sit to the side, again both with large iron hinges. The end bay of the building is formed by a structure clad in painted ship-lap timber.
- 3.14. A flint wall with flush brick pillars forms the western boundary of the car-park, running behind the outbuilding described above, and with a return to the car-park entrance. The remnants of a former building can be seen where the roof had previously butted up to the wall between the outbuilding and the front section of wall.
- 3.15. The section of the wall north of the outbuilding, separated from the it by a timber gate, is of a different construction than the more historic elements of the wall to the south of the outbuilding, having been constructed as a free-standing wall, thus requiring more brick supports than that of the more historic elements. The newer section of wall also has a brick plinth and a brick coping, providing more stability to the structure and to each panel of flintwork.

- 3.16. In addition to this, repairs have clearly been undertaken to this section of the wall, in particular to a large vertical crack, which appears to have cracked several bricks, rather than following the mortar lines.

*Significance*

- 3.17. The significance of the Six Bells lies predominantly in its aesthetic and historic values, with the aesthetic value arising through the differing methods and materials of construction, with the local vernacular being reflected in the first range, regional styles of timber-framing represented in the second range, with the twentieth century pargetting further reflecting a regional traditional finish. The third range contributes further, in particular through the stepping down of the roof heights across the front elevation. The extensions to the rear have largely removed the ability to experience the rear elevations of these ranges.
- 3.18. The aesthetic value is further enhanced by both the outbuilding, which is most likely a former stable associated with the pub, and with the historic sections of the flint and brick wall. However, the section north of the outbuilding is clearly a twentieth-century addition, with rebuilding most likely having taking place during the mid to late twentieth century. Furthermore, the introduction of this section of wall has removed the historic interconnectivity between what is was historically the courtyard of the pub, now the pub car-park, and the land to the west, evident on the 1885 Ordnance Survey map. Thus, this section of wall makes no contribution to the significance of this Grade II listed building, and its presence reduces an understanding of the historic relationship of this land and the pub.
- 3.19. The historic value of the pub results from its illustration of eighteenth-century local vernacular through the first range, the illustration of eastern school of timber-framing, with later pargetting. The stable block, whilst the only surviving range evident on earlier historic maps, provides some further illustration of the historic role and services of such inns, providing stabling for travellers' horses and carriages.

*Setting*

- 3.20. The setting of the pub is largely that of its curtilage, together with Church Road, both of which give the ability to experience and understand the significance of the listed building. The curtilage includes a tarmac drive leading to a parking area to the north, with a separate outbuilding, most likely a former stables. Beyond the parking area is an area of garden, the proposed area for development, separated from the car-park by trees.

- 3.21. To the east and adjacent to the pub is the Grade II listed Church Cottage, beyond which lies the unlisted house, Wayside. To the south, positioned on the opposite side of Church Road, lies the Grade II\* Church of St Peter, with the post-office and associated house lying adjacent. Directly to the west is an area of scrubland, with mature hedging to the road, limiting the degree to which the Six Bells can be readily experienced from beyond.
- 3.22. In terms of the contribution to significance, the position of the pub on the road, together with the former stables, provides the ability to understand the historic and continued use of the building, whilst at the same time allowing the various ranges of the pub, and their differing architectural styles, materials and construction to be experienced, thus contributing to the significance of the listed building.
- 3.23. The gardens to the rear of the pub, together with the tarmac car-park, are limited in their ability to allow the historic elements of the building to be experience due to the extensions, although they do provide the ability to understand and appreciate the historic and continued use of the building as a public house, whilst also allowing the building to be experienced within its own plot of land. However, the degree to which these latter areas contribute to the overall significance of the pub is low, in particular when considering the high level of contribution arising from the views afforded from Church Road.

*The Church of St Peter Description*

- 3.24. The Grade II\* listed Church of St Peter, dating for the most part to the fourteenth and fifteenth centuries, is constructed in flint rubble, with stone dressings and consists of a nave, chancel and tower, with porches to the north and south. The tower is set over four stages, with castellations, and has staged and stepped buttresses to each corner. The nave has a castellated parapet to the clay plain tiled roof and has three traceried Perpendicular windows to the south elevation and two to the north elevation, whilst the chancel has two traceried Perpendicular windows to each side elevation.
- 3.25. A low flint rubble wall, capped with clay ridge tiles, forms the boundary to the churchyard, with a timber lych-gate, with hipped roof and sat on stone supports, forms the entrance to the churchyard from Church Road.

*Significance*

- 3.26. The high significance of this Grade II\* listed church lies primarily in its aesthetic and historic values. The aesthetic value arises through the use of flint as the main construction material, reflecting the local and regional vernacular building material. The

architectural detailing, such as the Perpendicular windows, the heavy north porch, and the castellated tower, all further contribute to the aesthetic value of the church.

- 3.27. The church gains historic value through the fourteenth and fifteenth century date of its primary construction, illustrating the construction, design and architectural detailing of the period, whilst the later nineteenth century restoration reflects the national trend and need during this later period of restoring and re-ordering early churches.

*Setting*

- 3.28. The churchyard, surrounding the church, forms the principal element of setting for the church, where all aspects of the church can be readily experienced, including its architecture, scale, massing and historic detailing. The churchyard, forming the curtilage of the church, also separates the church from surrounding built form, thus allowing the primacy of the church to be understood and experienced.
- 3.29. Beyond this, Church Road and the properties in the immediate vicinity, also form part of the immediate setting, with clear views of the church provided from the road, through mature foliage, again allowing the primacy, architecture and use of the building to be readily understood.
- 3.30. Whilst the church cannot be easily seen from the green and beyond, partially due to the relatively low tower and the mature trees surrounding the churchyard, the village, as the primary focus of the church, contributes to the historic value of the listed building, and thus contributes to its significance.
- 3.31. The Site, lying to the rear of the Six Bells, forms part of the setting of the church, but due to the lack of intervisibility and co-visibility, cannot be seen as contributing to the aesthetic value of the listed building, although, through forming part of the village, does make a very low contribution to the historic value of this Grade II\* listed building.

*Church Cottage and Adjoining Cottage, Swallows Nest*

*Description*

- 3.32. This Grade II listed building, raised from a T-planform, sits over a single storey with attic for the main range, and over two storeys for the cross-wing, all dating to the seventeenth century. The building, constructed originally as three properties, now forms two properties, both rendered and painted with the cottage having visible timber-framing and pargetting, both with a hand-made plain clay tiled roof. At ground floor of the cross-wing (Swallows Nest) has two 12-light mullioned windows central to the front elevation,

with a timber plank door to the left-hand side. The jettied first floor has two further 9-light mullioned windows central to the elevation, with a leaded light stone mullioned window to each side. The gable, having no architectural detail, is also jettied from the first floor.

- 3.33. The main range, formed partially by the cottage between Swallows Nest and Church Cottage, has a door adjacent to the cross-wing, with two side-hung casements sat under timber lintels, whilst the roof is pierced by one half-dormer, containing a side-hung casement, sat under a gabled roof covered in clay tiles and with barge boards, and a smaller, full dormer, also containing a timber casement, and sat under a gabled, tiled roof with barge boards. Church Cottage has a door adjacent to the adjoining cottage, with a single 12-light mullioned window to the right.

*Significance*

- 3.34. The significance of this Grade II listed building is noted in the list description as being for its Group Value (i.e. as set out in the Principles of Selection for Listed Buildings, this is for the external appearance), with the interior largely not inspected either for this report or for the list description. Its primary heritage value therefore is its aesthetic value, arising from its general appearance based on a T-planform, its rendered elevations to Swallows Nest, the visible timber-framing to Church Cottage, and the pargetting, which appears to be of late twentieth century date. The jettied construction of Swallows Nest, together with the stepping-down of the roof from Swallows Nest to Church Cottage, the mullioned windows and the dormers all provide further contribution to the aesthetic value.
- 3.35. The building also has some historic value, both from its period of construction, illustrating an eastern school of timber-framing, whilst its presence in the setting of both the pub and the church, contributes to its group value.

*Setting*

- 3.36. The primary setting of this Grade II listed building is that of Church Road, where the front elevation of the building can be clearly and readily experienced, and where its historic context within the settlement can be understood and appreciated, thus contributing to its significance, in particular to the Group Value. Other buildings, including the pub, the church, the post office and Wayside, to the east, all form part of this setting, and through similar architecture and construction materials, again contribute to both the aesthetic and historic group value of the building.

- 3.37. The Site, sitting to the west of the building, and largely separated from it by the pub, allows glimpses of the rear elevation and roofscape of Swallows Nest, from where the building can be seen in the context of other development, including the pub. This, therefore, makes a small contribution to the significance and Group Value of this Grade II listed building.

*Felsham Conservation Area*

*Description*

- 3.38. Designated in 1996 by Mid Suffolk District Council, the Felsham Conservation Area covers the historic core of the village, including the numerous entrances into the village, although a central area to the north-west of the Green, containing late twentieth century development, is excluded from the boundary. The Conservation Area Appraisal, prepared in 2012, provides an overview of the significance of the Conservation Area, and has been referenced through the following description.
- 3.39. The building stock within the village and within the boundary of the Conservation Area ranges in date from the fourteenth, fifteenth and sixteenth centuries, through to the mid and late twentieth century. The palate of construction materials and the design and appearance of the buildings are generally illustrative of these periods, with historic materials including red and white brick and timber-frame, with rendered infill panels, plain clay tiles and pantiles evident throughout, with occasional examples of thatch. Later materials are generally of modern brick. Additional architectural detailing includes flint and brick walls, which are present throughout the conservation area.
- 3.40. The Conservation Area has a large amount of trees and mature hedges, both lining the roads and in private grounds, providing a verdant character and appearance to the Conservation Area, and providing a visual link to the surrounding countryside.
- 3.41. Due to the nature of the roads, with long stretches and wide corners, and with the majority of the building stock set back from the roads, good views along the roads are gained to important features such as the two greens, and to open countryside from the entrances to the conservation area, whilst views into the conservation area, again from the various entrances, give medium distance views, often framed by trees and hedges.



*Significance*

- 3.42. The significance of the Conservation Area lies partially in its aesthetic quality, with a wide range of building materials, including timber, plaster, flint and brick together with the wide range of architectural styles, from the fourteenth century church, and sixteenth century close-studding timber-frame through to the localised vernacular of the mid- to late nineteenth century. More modern properties present within the boundary of the Felsham Conservation Area provide little to no input to the aesthetic value of the conservation area.
- 3.43. The largely linear nature of the Conservation Area, in particular along Church Road and Cockfield Road, allows medium distance views where the historic fabric and character, as well as the open spaces and the green infrastructure of the Conservation Area can be readily experienced, thus further contributing to the aesthetic value of this designated heritage asset.
- 3.44. The Conservation Area also has considerable historic illustrative value, arising through its longevity as a settlement, represented both in its planform, developed from the junction of four roads leading to settlements beyond, including Bury St Edmunds, as well as from the building stock and its illustration of varying periods of development and construction.
- 3.45. The Site, lying within the heart of the Felsham Conservation Area, makes little contribution to the significance of the asset, although the scrubland and trees to the west of the Six Bells, do provide some input to the overall verdant quality of the conservation area.

*Setting*

- 3.46. The setting of the Felsham Conservation Area is largely agricultural in character and appearance, with the fields surrounding the conservation area, adding to the aesthetic value of the asset through the rural nature of the landscape, reflecting the agricultural and rural character of the conservation area. The illustrative value of the asset is further enhanced by this setting through the clear historic links of the conservation area with the surrounding landscape.

#### 4. IMPACT ASSESSMENT

##### Development Proposals

- 4.1. Development proposals at the Site include the construction of two detached dwellings with associated parking and landscaping on land currently acting as gardens and car-parking to the Six Bells public house. Access to the development is proposed via the existing vehicular access to the pub, with a driveway extending to the side providing access to the proposed development to the rear of the pub.
- 4.2. The two proposed dwellings are located in the same position to that of the previous 2011 scheme (covered in detail within the Planning, Design & Access Statement prepared by CPC and submitted as part of this application), which the Inspector noted would retain sufficient space to the setting of the listed building so as not to have any harm on its significance, as well as the loss of the land to development not having any detriment to the significance of the Felsham Conservation Area.
- 4.3. In addition, the amended scheme has now further reduced the bulk of the proposed dwellings compared with the earlier application in 2023, resulting in buildings which have less mass and are smaller than those in the 2023 scheme, and are positioned in the same location as the 2011 scheme – thus, whilst the 2022 Appeal Decision find that there is some harm to the significance of the Conservation Area, the scheme has been amended to take account of this Decision, and to replicate and reduce the scheme otherwise found acceptable in heritage terms in the 2011 scheme, which purely identified harm to the Conservation Area arising from the loss of part of the boundary wall. Furthermore, the previously proposed detached car ports have been deleted from the plans, substantially reducing the ground coverage of the scheme.
- 4.4. The design of the two dwellings takes reference from the local vernacular, utilising a mix of traditional materials, as identified in the Felsham Conservation Area Appraisal, including painted render, timber casement windows, timber bargeboards to the eaves, brick chimneys and clay pantile roofing.
- 4.5. A full description of the development proposals is outlined in the separately prepared Planning, Design and Access Statement.
- 4.6. The Site forms part of the curtilage and immediate setting of the Six Bells PH, and the Church of St Peter and Swallows Nest, Church Cottage and adjoining Cottage all lie within the immediate vicinity of the Site, whilst the Site also lies within the Felsham

Conservation Area. As such, an assessment of the potential impact on the significance of each of these designated heritage assets is undertaken below.

4.7. Based on the measured drawings (references below) prepared by PLC Architects, dated September 2023, the following provides an assessment of the impacts that the development proposals will have upon the significance of the heritage assets identified. The drawings referenced are:

- 22-3395-110\_P2
- 22-3395-111\_P1
- 22-3395-112\_P1
- 22-3395-113\_P1
- 22-3395-114\_P1
- 22-3395-115\_P2
- 22-3395-116\_P1

**Assessment of Impact**

4.8. This stage of the assessment will consider both the impact of the proposed development on the significance of each of the heritage assets in turn and will then examine the potential for maximising enhancement and/or minimising harm, where identified. In examining the impact of the proposed development on the significance of the identified heritage assets, consideration is given to the scale, design, materials, and location of the proposed signs, and the degree to which these may alter the way in which the Site and surrounding heritage assets are experienced.

*The Six Bells*

4.9. Both the 2011 and 2022 appeal decisions noted that the proposed dwellings were set back sufficiently from the Six Bells as to have no impact on its significance or its setting, insofar as it contributes to such significance. The proposed dwellings subject of this application are located in the same area, beyond what would have been the historic courtyard of the pub, and thus are considered to be of a sufficient distance, with sufficient screening, so as to have no impact on the significance of the Six Bells.

4.10. As such, the primary areas of significance of this listed building will be preserved from harm, whilst the development of the Site will see an area of setting which makes no particular contribution to significance developed.

4.11. As such, there will be no harm on the significance of the Grade II listed Six Bells, and its significance will be preserved from harm in line with the legislative and policy framework.

*The Church of St Peter*

- 4.12. As described above, the significance of this asset is largely derived from its aesthetic, historic and evidential values, through its overall appearance, its representation of fourteenth and fifteenth century church architecture, whilst the Site has been shown to have no particular contribution to the significance of this asset.
- 4.13. Where there is any potential for any intervisibility, the proposed development will be largely heavily screened from the asset by the Six Bells, and thus the overall impact on the significance of the listed building is identified here as being neutral.
- 4.14. The proposed development will therefore preserve the significance of the Grade II\* listed Church of St Peter.

*Church Cottage and Adjoining Cottage, Swallows Nest*

- 4.15. As noted above, this building has been listed for its group value, and the degree to which its external appearance contributes to the significance of other listed buildings in the vicinity.
- 4.16. The proposed development is set back in the plot and is sufficiently removed from this listed building so as to have no impact on its significance or on its setting, insofar as it contributes to significance.
- 4.17. The group value with both the Six Bells and with the Church of St Peter will remain unscathed, and thus the significance of this Grade II listed building will remain unharmed, and thus will be preserved.

*Felsham Conservation Area*

- 4.18. In assessing the impact of the proposed development, it is important to note the findings of the three previous appeals on the Site, and how the current scheme addresses those findings in relation to the impact on the Felsham Conservation Area.
- 4.19. In 2011, the Inspector noted that:

*“The proposed buildings would be set well back into the site behind the public house and its car park. I am satisfied that sufficient space would be retained to the rear of the public house for the loss of some open land not to be detrimental to the character and appearance of the area. The site is surrounded by the rear gardens of neighbouring*

*dwellings and by some commercial development. The main public views of the proposed dwellings would be between other buildings from Upper Green and Bury Road to the west. With the external materials proposed I consider that the design and siting of the proposed dwellings would not harm the Conservation Area". The Inspector also found, with regards to the boundary wall, that it "is a valuable asset to the Conservation Area. The proposal to enlarge the existing gap in the western wall for the access drive would be screened from views from Church Road and from some parts of the car park by the outbuilding but would be seen from other areas to the rear of the public house accessible to customers. The gap would be significantly wider than at present and would be seen in the context of the new driveway. As with the setting of the listed building, having regard to the available evidence on the condition and age of the wall, I consider that the loss of this section would be harmful to the Conservation Area", thus providing the only heritage-reason for the dismissal of the Appeal.*

4.20. In the 2022 Appeal, the Inspector noted that the proposal would:

*"involve the erection of two substantial, tall and wide, four bedroomed detached dwellings each with associated detached carport buildings. The proposed buildings would have relatively large built footprints and would be set in relatively small plots positioned close together at the head of a new access road. There would be glimpsed views of the proposed dwellings through the access drive and through gaps in the vegetation from Church Road and through gaps between buildings on Bury Road. However, the proposed dwellings would be widely visible from the properties which surround the appeal site including the retained outdoor space associated with the Six Bells.*

*In my view, the proposal would noticeably introduce a significant bulk of compact modern development into this part of the CA. Whilst the proposed finishing materials would match those used in the locality, the proposed dwellings would appear as a pair of large executive houses, which would have an overall basic, bulky and cramped appearance which would conflict with the spaciouly arranged variation of traditional buildings with varied architectural detailing in the locality.*

*Even though the appeal site is not directly referenced in the Council's CAA it currently forms part of a pleasant green undeveloped space within the CA. Through the proposed development the spacious quality of this part of the CA would be eroded and a conflicting and incongruous form of development would be introduced. Therefore, overall, even though I have found no harm to the setting of the grade II listed Six Bells, I find the proposed development would harm and fail to preserve or enhance the CA harming its*

*significance as a whole”.*

- 4.24. To conclude the above, whilst the 2011 appeal scheme was acceptable in respect of massing, scale, design and position of the proposed dwellings, and that these would not result in harm to the Conservation Area, it was the creation of a new access through the boundary wall which was identified as the cause of harm. The 2022 appeal scheme found that, whilst the number of dwellings was reduced, the scale and massing of the proposed two dwellings was such that they would present an incongruous development and would therefore harm the significance of the Conservation Area. The Council determined that the earlier application in 2023 had unacceptable impacts in the Conservation Area.
- 4.25. In order to address these concerns, the current scheme has been further amended from the two appeal schemes and the earlier application in 2023, responding to the concerns and issues raised in each. Firstly, the boundary wall has been retained, thus overcoming the reason for dismissal in the 2011 scheme. In respect of the 2022 scheme, the dwellings have now been moved back to the positions shown in 2011 scheme, which was found to be acceptable at appeal, whilst the dwellings have been reduced in their scale and footprint, and the detached car ports omitted, as illustrated in Drawing Numbers 22-3395-110\_P2 and 22-3395-114P1, thus addressing the concerns raised in the 2022 Appeal decision and the 2023 refusal.
- 4.26. The Inspector in the 2022 Appeal noted that:

*However, the proposal would involve the erection of two substantial, tall and wide, four bedroomed detached dwellings each with associated detached carport buildings. The proposed buildings would have relatively large built footprints and would be set in relatively small plots positioned close together at the head of a new access road. There would be glimpsed views of the proposed dwellings through the access drive and through gaps in the vegetation from Church Road and through gaps between buildings on Bury Road. However, the proposed dwellings would be widely visible from the properties which surround the appeal site including the retained outdoor space associated with the Six Bells.*

*In my view, the proposal would noticeably introduce a significant bulk of compact modern development into this part of the CA. Whilst the proposed finishing materials would match those used in the locality, the proposed dwellings would appear as a pair of large executive houses, which would have an overall basic, bulky and cramped appearance which would conflict with the spaciouly arranged variation of traditional buildings with varied architectural detailing in the locality.*

*Even though the appeal site is not directly referenced in the Council's CAA it currently forms part of a pleasant green undeveloped space within the CA. Through the proposed development the spacious quality of this part of the CA would be eroded and a conflicting and incongruous form of development would be introduced. Therefore, overall, even though I have found no harm to the setting of the grade II listed Six Bells, I find the proposed development would harm and fail to preserve or enhance the CA harming its significance as a whole.*

4.27. In contrast to this, the Inspector in the 2011 Appeal Decision noted:

*The appeal site is part of an existing space within the Conservation Area used by the public house as a car park and amenity area. The proposed buildings would be set well back into the site behind the public house and its car park. I am satisfied that sufficient space would be retained to the rear of the public house for the loss of some open land not to be detrimental to the character and appearance of the area. The site is surrounded by the rear gardens of neighbouring dwellings and by some commercial development. The main public views of the proposed dwellings would be between other buildings from Upper Green and Bury Road to the west. With the external materials proposed I consider that the design and siting of the proposed dwellings would not harm the Conservation Area.*

4.28. Taking both of these assessments of the effect of development on the Conservation Area, there is clear acceptance that development, in principle, is acceptable in this location, but it was the scale, massing and overall density of development proposed within the 2022 Appeal which resulted in some less than substantial harm to the significance of the Conservation Area. This concern was echoed in the 2023 refusal.

4.29. With the current scheme now proposing development in the same location, and with a reduced height and massing compared with that supported by the Appeal Inspector in 2011, the issues and concerns, and the effect on the Conservation Area, have now been negated from the 2022 Appeal scheme and the 2023 scheme.

4.30. As stated in previous applications, the proposed development will sit sufficiently back in the plot so as to have no impact on the significance of this conservation area, and is not located within any important vista or on any important green areas as identified in the Felsham Conservation Area Appraisal.

4.31. The use of traditional materials, as identified within the Felsham Conservation Area Appraisal and found throughout the Conservation Area, such as painted render, brick, timber windows and tile roofing, will all complement the character and appearance of the Felsham Conservation Area. The use of traditional elements of design, such as the introduction of quoins to the corners of dwellings and to windows and doors and the use

of timber cladding, further enhances the quality of the proposed development, ensuring that the dwellings respect and complement the traditional building stock of the Felsham Conservation Area, as was noted with the previous appeals.

- 4.32. The proposed development will therefore address all the concerns and issues pertinent to heritage raised in the two previous Appeal decisions and the recent local decision, and will ensure that it preserves the special architectural and historic interest of this conservation area, thus removing any reasons for refusal in relation to heritage.



**5. MITIGATION AND CONCLUSION**

- 5.1. The significance of the Grade II listed Six Bells has been shown to arise from its aesthetic value, in particular through the three different phases of building, their differing construction materials, and their overall appearance, as well as through the illustrative value as an historic inn. Its setting varies in terms of its contribution to significance, with the experience from the front and sides of the building providing the largest contribution to significance and allowing the building to be experienced, whilst the Site has been shown to make only a low contribution. As such, the proposed dwellings will have no impact on the significance and setting of the Grade II listed Six Bells.
- 5.2. Whilst the previous appeal decision found that the removal of the section of wall to allow the access drive would result in harm to the setting and significance of the listed building, this scheme now retains this section of wall, ensuring that the previously identified harm has been overcome and mitigated through design.
- 5.3. The significance of the Church of St Peter is encompassed in its aesthetic value, in particular through the use of flint as well as architectural detailing such as the Perpendicular windows, whilst it also has illustrative value through its representation of fourteenth and fifteenth church architecture. The Site makes no particular contribution to significance, and as such the proposed development will see the significance of this Grade II\* listed building preserved from harm.
- 5.4. With regards to Church Cottage and the adjoining cottage, Swallows Nest, the significance of this building largely arises through its group value, in particular through the retention of timber-framing, its overall appearance, and the contribution it makes to the setting of both the Six Bells and the Church of St Peter. As there will be no impact on such significance, this Grade II listed building will be preserved from harm.
- 5.5. In terms of the Felsham Conservation Area, as with the Six Bells, the section of wall previously identified for removal is now to be retained, and thus the element of harm previously identified has been overcome and mitigated through design, ensuring that the significance of this asset will be preserved from harm. In addition, the current scheme also addressed the issues raised and identified in the 2022 appeal and 2023 scheme.
- 5.6. In terms of mitigation, the design, scale, massing and location of the proposed development has ensured that the aesthetic and illustrative value of the identified heritage assets will be retained. As such, there is no mitigation necessary to reduce harm to the significance of any of the assets through development within their respective settings.

- 5.7. As such, with the significance of the four identified designated heritage assets being preserved from harm, there is no heritage-based reason, when considering the tests both within the statutory framework and within the NPPF, for the proposed development to be refused.

## REFERENCES

British Standards Institute (BSI) (2013) Guide to the Conservation of Historic Buildings (BS 7913: 2013)

English Heritage (2008) Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment

Historic England (2017) Historic Environment Good Practice Advice in Planning Note 3 (GPA 3): The Setting of Heritage Assets (2<sup>nd</sup> edition)

HMSO (1990) Planning (Listed Buildings and Conservation Areas) Act (As Amended)

HMSO (2013) Enterprise and Regulatory Reform Act

Ministry of Housing, Communities and Local Government (MHCLG) (2019) National Planning Policy Framework (NPPF)

MHCLG (2019) Planning Practice Guidance (PPG): Historic Environment

<https://opendomesday.org/place/TL9457/felsham/>

Felsham Conservation Area Appraisal

British History Online (<https://www.british-history.ac.uk/>)

Landmark mapping (2020)

<http://felshamhistory.blogspot.com/2011/03/notes-for-history-of-felsham.html>

**APPENDIX A: STATUTORY LIST DESCRIPTIONS**

THE SIX BELLS PUBLIC HOUSE, CHURCH ROAD

Grade II

List Entry Number: 1352348

Date first listed: 18-Apr-1988

National Grid Reference TL 94663 57065

FELSHAM CHURCH ROAD TL 95 NW 2/42 The Six Bells Public - House GV II Public house.

Built in 3 main ranges. From left to right: c.1830 range of 2 storeys and 2 windows; a lower range also of 2 storeys and 2 windows, of late C16 with possible earlier core; and an early C20 range of one storey and 2 windows. Range 1: flushed flint rubble with dressings of gault brick, a band at 1st floor and a dentiled eaves cornice. Hipped slated roof with external chimney of gault brick. Sashes with cambered heads of gauged brick, flush frames and small panes; at ground storey is a tripartite sash. Panelled entrance door with pilasters and cornice. Range 2: timber-framed and plastered with C20 pargetting in panels. C19 slated roof with 2 internal chimneys of red brick. Small-pane casements and a splayed sash-window bay all of c19. The right-hand range has a plain tiled roof. Interior Range 2 is of two cells. The left-hand cell has heavy C16 unchamfered floor joists and some studding exposed; there is evidence in the wall framing that this floor is inserted into an earlier building. The right-hand cell has C17 on-edge floor joists also apparently inserted.

CHURCH COTTAGE AND ADJOINING HOUSE, CHURCH ROAD

Grade II

List Entry Number: 1285415

Date first listed: 18-Apr-1988

National Grid Reference TL 94682 57068

FELSHAM CHURCH ROAD TL 95 NW 2/41 Swallows Nest, Church Road. Cottage and adjoining house GV II

Three house, built as one. An early C17 parlour cross-wing to left, a hall range to right which may be earlier. 3-cell plan. Swallows Nest comprises the cross-wing: 2 storeys. Timber-framed and plastered: the 1st floor is end-jettied and the tie-beam at the gable foot is also jettied with a fragment of carved pendant at the left-hand end. Ground storey walling and left hand side wall are encased in painted red brick. Plain tiled roof. Twin c19 small-pane sashes; and c19 boarded entrance door with glazed panel. Hall range: one storey and attics. Timber-framed, fully encased in C19 red brick, partly painted. Plain tiled roof with one c19 gabled plain tiled dormer. Small-paned casements with timber lintels. A half-glazed C19 panelled door and a framed and boarded entrance door, at lobby-entrance and cross-entry positions respectively. Interior not examined.

The Six Bells PH, Felsham, Mid Suffolk  
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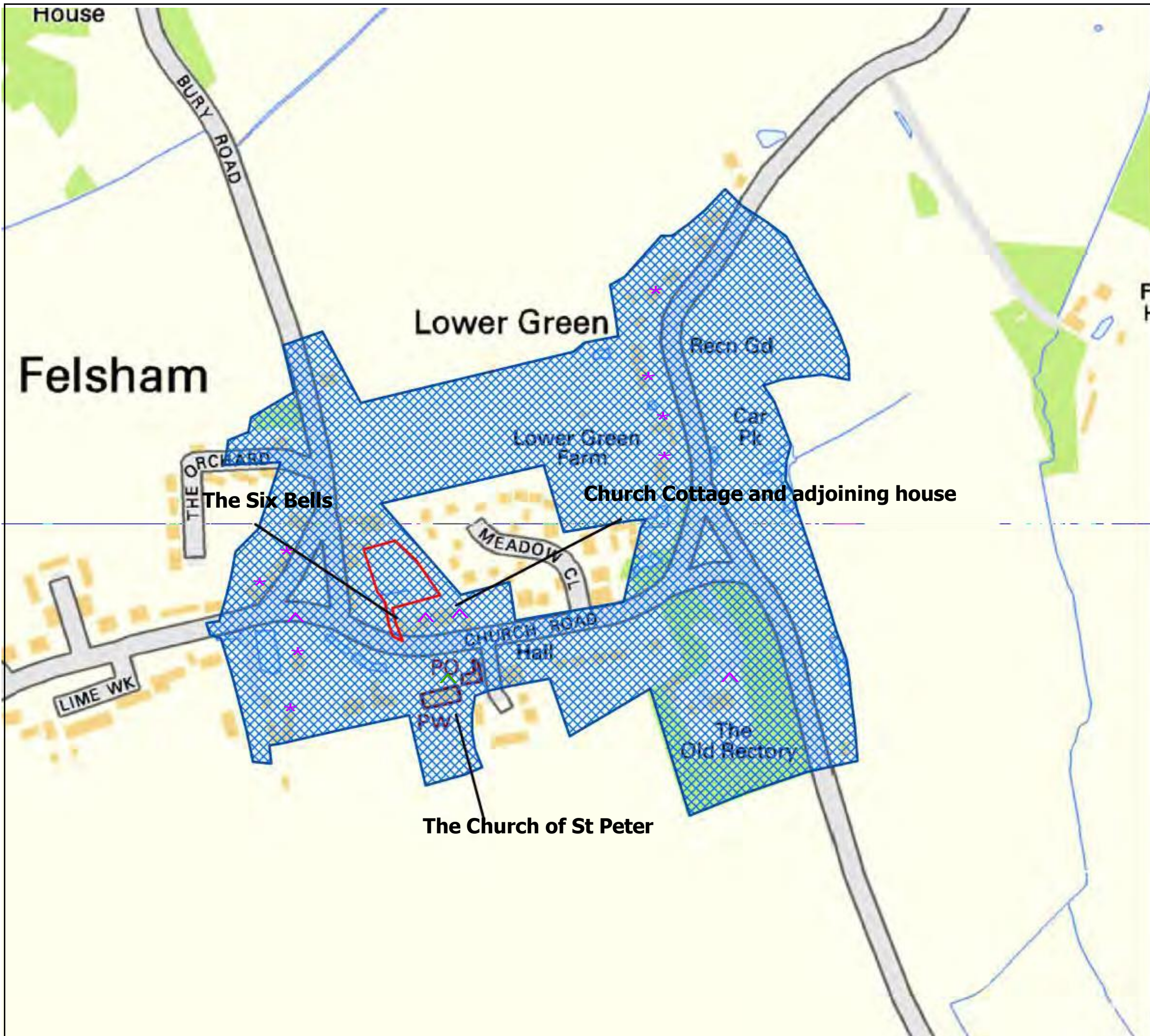
CHURCH OF ST PETER, CHURCH ROAD  
Grade II\*  
List Entry Number: 1032627  
Date first listed: 15-Nov-1954  
National Grid Reference TL 94681 57005

FELSHAM CHURCH ROAD TL 95 NW 2/40 Church of St Peter - 15.11.54 GV II\*

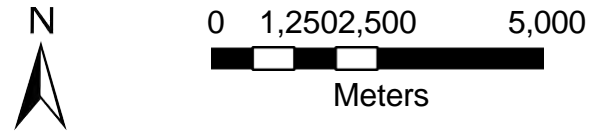
Parish church, medieval. Restored 1872. Nave, chancel, west tower, north and south porches. Flint rubble with freestone dressings. Plain tiled roofs with parapet gables; the nave has parapets. Mainly late C14 work: 4-stage tower with traceried belfry windows. Moulded west doorway has a hood-mould with grotesque corbels, and above is a window with dagger tracery. Several good C14 2-light side windows in nave and chancel, and simply moulded north and south doorways. A prominent north porch added c.1500 with good quality details. Completely covered in flushwork: chequer-work at the sides and in trefoil-headed panels at the front and to the buttresses. A pair of north buttresses with sunk traceried panels beneath buttressed and canopied image niches. Each contains a carved stool and fan-vaulted coving; and an identical niche is set above the doorway. The doorway has square flowers and grotesques and crowns in casement mouldings, and the hood-mould has lions beneath and a square label with shields and leaf carving. Large traceried porch side windows and moulded arch-braced roof. Interior: wide C14 chancel arch. An unusual font; the octagonal bowl and stem of c.1500 with tracery and supporting angels is set upon the bowl of the previous mid C14 font bowl. This has been cut down, but the upper half of the sunk panels have traceried heads and various carved figures. Major remodelling of 1872 included rebuilding of nave and chancel roofs and refurnishing throughout. Arms of George III over south doorway.

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Cordage 44 Ltd

**APPENDIX B: HERITAGE ASSETS MAP**



- Site location
- Felsham Conservation Area
- Listed Buildings**
- Grade**
- \* I
- \* II
- \* II\*



Date	Vs
21 April 2020	

Client	
Cordage 13	

Scheme Name	
The Six Bells, Felsham	

Name	
Simon Roper-Pressdee	

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**APPENDIX C: PLATES**



**Plate 1:** The Six Bells, viewed from Church Road



**Plate 2:** Boundary wall and side elevation of outbuilding.





**Plate 3:** Outbuilding seen from the pub car-park.



**Plate 4:** Proposed location of access road to side of outbuilding.

The Six Bells PH, Felsham, Mid Suffolk  
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**Plate 5:** The Church of St Peter, seen from Church Road.



**Plate 6:** The Church of St Peter.

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**Plate 7:** Church Cottage and adjoining Cottage, Swallows Nest.



**Plate 8:** View along Church Road towards Upper Green.



**Plate 9:** Properties within the Conservation Area on Upper Green



**Plate 10:** Properties within the Conservation Area on Upper Green

## **APPENDIX D: LOCAL PLANNING POLICIES**

### **Local Planning Policy**

#### Mid Suffolk Local Plan (1998)

##### *Protection of historic buildings - Policy HB1*

The district planning authority places a high priority on protecting the character and appearance of all buildings of architectural or historic interest. Particular attention will be given to protecting the settings of listed buildings.

#### Mid-Suffolk Core Strategy (adopted September 2008 and subject of a focused review in December 2012)

##### *Core Strategy Objectives SO 4*

To protect, manage, enhance and restore the historic heritage / environment and the unique character and identity of the towns and villages by ensuring that new developments are appropriate in terms of scale and location in the context of settlement form and character.

##### *Policy CS 2 - Development in the Countryside and Countryside Villages*

In the countryside development will be restricted to defined categories in accordance with other Core Strategy policies. These will include:

- agriculture and forestry;
- the preservation of Listed Buildings;
- rural exception housing to include:
  - agricultural workers dwellings
  - possible conversion of rural buildings
  - replacement dwellings
  - affordable housing on exception sites
  - sites for Gypsies and Travellers and travelling showpeople
- the extension of dwellings;

- the reuse and adaptation of buildings for appropriate purposes, as defined elsewhere in this document;
- new-build employment generating proposals where there is a strategic, environmental or operational justification;
- recreation and tourism;
- community services and facilities meeting a proven local need;
- development by statutory undertakers or public utility providers;
- flood protection;
- renewable energy projects;
- mineral extraction;
- waste management facilities.

*Policy CS 5 - Mid Suffolk's Environment*

All development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area.

To protect, manage and enhance Mid Suffolk's biodiversity and geodiversity based on a network of:

- Designated Sites (international, national, regional and local)
- Biodiversity Action Plan Species and Habitats, geodiversity interests within the wider environment
- Wildlife Corridors and Ecological Networks

and where appropriate increase opportunities for access and appreciation of biodiversity and geodiversity conservation for all sections of the community. Emphasis will be given to the creation new habitats particularly along the Gipping, Upper Waveney and Deben river valley's in connection with flood management schemes and to contribute towards green tourism opportunities.

Landscape: The Council will protect and conserve landscape qualities taking into account the natural environment and the historical dimension of the landscape as a whole rather than concentrating solely on selected areas, protecting the District's most important components and encourage development that is consistent with conserving its overall character.

Design: Development will be of a high quality design that respects the local distinctiveness and the built heritage of Mid Suffolk, enhancing the character and appearance of the district. It should create visual interest within the street scene and where appropriate encourage active uses at ground floor level, creating uses of public space which encourage people to walk and cycle.

Historic Environment: The Council will introduce policies in the other DPDs of the Local Development Framework to protect, conserve and where possible enhance the natural and built historic environment including the residual archaeological remains. These policies will seek to integrate conservation policies with other planning policies affecting the historic environment.

Emerging Babergh and Mid Suffolk Joint Local Plan

*Policy LP20 - The Historic Environment*

1. The Councils will:

- a. Support the re-use/ redevelopment of a heritage asset, including buildings at risk, where it would represent optimal viable use including assets in isolated locations
- b. Support development proposals that contribute to local distinctiveness, respecting the built form and scale of the heritage asset, through the use of appropriate design and materials.
- c. Require development that includes heritage assets with archaeological interest to submit an appropriate desk-based assessment and, where necessary, a field evaluation by a suitably qualified person.
- d. Have regard (or Special Regard where appropriate) to the historic environment and take account of the contribution any designated or non-designated heritage asset makes to the character of the area and its sense of place. All designated and non-designated heritage assets must be preserved, enhanced or conserved in accordance with statutory tests and their significance.
- e. Depending on the nature of the works/development proposed, require the applicant to demonstrate via the submission of a heritage statement that:

- I. The significance of the heritage asset is fully understood (statement of significance);
- II. The potential impacts on the heritage asset's special character and setting are understood (impact assessment);
- III. The proposal has been fully justified in light of the significance and impact identified above (statement of justification); and
- IV. Establishes a conservation strategy, including details of mitigation, repair, preservation, protection and recording as appropriate.

f. Support proposals to enhance the environmental performance of heritage assets where a sensitive approach to design and specification ensures that the significance of the asset is not compromised by inappropriate interventions and the special characteristics of the heritage assets are safeguarded. All proposals should have regard to the Historic England Advice guidance note "Energy Efficiency and Historic Buildings".

g. In the interests of safeguarding and enhancing local distinctiveness only support development if there are no adverse impacts to, or loss of, buildings/features of local architectural landscape or historic interest subject to their level of significance and whether the adverse impacts that may arise from a development proposal cannot be reasonably avoided and are outweighed by public benefits. Where development is considered acceptable;

- I. An agreed programme of work will be required for recording prior to development.
- II. Impacts on archaeological sites/historic buildings will be mitigated through obligations and /or conditions.



**APPENDIX E - Heritage Impact Assessment Methodology**

In order to understand the impact of proposed development on heritage assets, an understanding of the significance of the assets needs to be undertaken. Following this, the steps set out in GPA3 (Historic England, 2017) provide a tool for assessing the impact on the setting of heritage assets, and these are utilised herein to assess the impact on significance.

**Significance**

Conservation Principles, Policies and Guidance (Historic England, 2008) outlines Historic England’s approach to the sustainable management of the historic environment. While primarily intended to ensure consistency in Historic England’s own advice and guidance, the document is recommended to LPAs to ensure that all decisions about change affecting the historic environment are informed and sustainable.

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

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

**Assessment of Impact**

In order to understand the impact of proposed development on a listed building within the Site, an assessment of the proposed development on the heritage values described above is undertaken, using professional judgement.

Following this, and in considering the impact on the setting of heritage assets, GPA3 (2017) states that the conservation or enhancement of an asset by taking its setting into account need not prevent change and that decisions relating to such issues need to be based on a proportionate assessment of the particular significance of any heritage asset that may be affected by a proposal. It is further stated that the contribution made to an asset’s significance by its setting will vary depending on the nature of the asset and the setting. Different heritage

assets have the capacity to accommodate change differently within their settings, possibly without harming the significance of the asset (or even enhancing its significance) and, therefore, setting should be assessed on a case-by-case basis. Although not prescriptive in setting out how this assessment should be carried out, Historic England recommend using a '5-step process' to assess any effects of a proposed development on the setting and significance of a heritage asset:

- Step 1: Identification of built heritage assets and their settings.

A search of the Historic Environment Record (HER), together with the National Heritage List (NHL) and the Council's website provides an initial list of potential heritage assets to be considered, including listed buildings, conservation areas, and other national or local heritage designations which may need to be considered. This is augmented with a site visit and additional research, where other buildings and structures not included in any of the above, but potentially considered as non-designated heritage assets, can be identified. Each heritage asset is visited, as far as public access allows, and its surroundings are examined in order to understand the degree to which elements of the surroundings allow for the building to be experienced or better understood, therefore identifying its setting, as defined within the NPPF.

- Step 2: Assess whether, how and to what degree these settings make a contribution to the significance of the heritage assets.

In order to undertake this stage, the significance of the heritage assets has to be understood, whether designated or non-designated. Although there is no proscriptive method for assessing significance, this Appraisal utilises the heritage values<sup>1</sup> set out in Conservation Principles, Policies and Guidance (English Heritage, 2008), and considers each heritage asset against these values. Whilst the British Standard suggests a variety of additional potential values, the ones set out by in Conservation Principles are generally recognised as appropriate and proportionate values to assess. Once each heritage asset has been assessed against the five heritage values, and its significance is understood, an assessment of the contribution of setting to this significance can be undertaken. This is achieved through assessing each element of setting against the heritage values of the asset, and identifying whether it a positive, negative or neutral contribution, if any—and if so, identifying which heritage values it contributes to and how. The final stage is to identify the relative extent of significance arising from setting, in comparison to other sources of heritage value.

- Step 3: Assess the effect of the proposed development on the significance of the heritage assets.

GPA3 sets out suggested, although non-exhaustive, potential attributes of a development which may affect the setting of heritage assets, which include location and siting of the development; the form and appearance of the development; other effects such as planting, lighting, noise, change to general character, and changes to skylines or built surroundings and spaces; permanence of the development; and longer term or consequential effects of the development. These are used as a guide and a basis from which to assess how a development may alter a particular element of setting, and to understand which heritage values the proposed development may impact upon. Details of the design of the proposed development will often vary, and will range from initial concepts through to detailed plans and elevations, verified photographs and photomontages. Where details are lacking, assumptions based on professional judgement and knowledge can be used to undertake assessment—where this is the case, this will be set out clearly in the report, and caveated accordingly. Where harm is identified to the significance of a designated heritage asset, the nature of harm is explained, and the extent of harm to significance is set out in terms of substantial harm, or in degrees of less than substantial harm, as appropriate. Where harm is identified to the significance of a non-designated heritage asset, the nature of harm is set out in terms of high, moderate, low or negligible. This is in recognition that the NPPF differentiates the extent of weight to be afforded to the conservation of a heritage asset, dependant on its status of designation. Where benefit is identified, this is identified in terms of substantial, moderate, low or negligible, for the purpose of clarity.

- Step 4: Maximising enhancement and minimising harm

Although this Step generally relates to identification and assessment of potential impact during design, and the subsequent mitigating harm through re-design, for the purposes of this assessment, this Step will be used to identify areas of where there is heritage benefit within the scheme, and/or elements of mitigation integral to the design (for instance, landscaping, or repairs to a listed building). In order to be able to undertake a quantitative balancing exercise between heritage benefit and heritage harm in the next Step, benefit is referred to in terms of substantial, moderate, low or negligible.

- Step 5: Making and documenting the decision and monitoring the outcomes

As this final stage is explicitly for the decision-maker, this Step is not undertaken within this assessment. However, as any decision will be based on the compliance of the proposed scheme with legislation and policy at both national and local level, this Step is used to assess whether the scheme is in line with the requirements stemming from such. A synopsis of the identified impacts on each heritage asset is provided, followed by an assessment of cumulative harm on the surrounding historic built environment. Where both heritage harm and heritage benefits are identified, a balancing exercise of these is undertaken. Finally, the assessment will identify whether the proposed scheme is compliant with relevant legislation and policy, and whether any additional balancing of harm against public benefit is required. This final Step will take account of all relevant and up-to-date case-law as it pertains to the scheme, as well as the planning history of the site where relevant, including (but not exclusively) any previous applications, appeals, together with any formal or informal pre-application advice from both the Local Planning Authority and from Historic England.

**APPENDIX F: HISTORIC MAP PROGRESSION**



**Historical Map 1:** 1884 Ordnance Survey (1:10,000)



**Historical Map 2:** 1905 Ordnance Survey (1:10,000)

The Six Bells PH, Felsham, Mid Suffolk  
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**Historical Map 3:** 1958 Ordnance Survey (1:10,000)



**Historical Map 4:** 1979 Ordnance Survey (Landmark) (1:10,000)

The Six Bells PH, Felsham, Mid Suffolk  
Cordage 13 Ltd

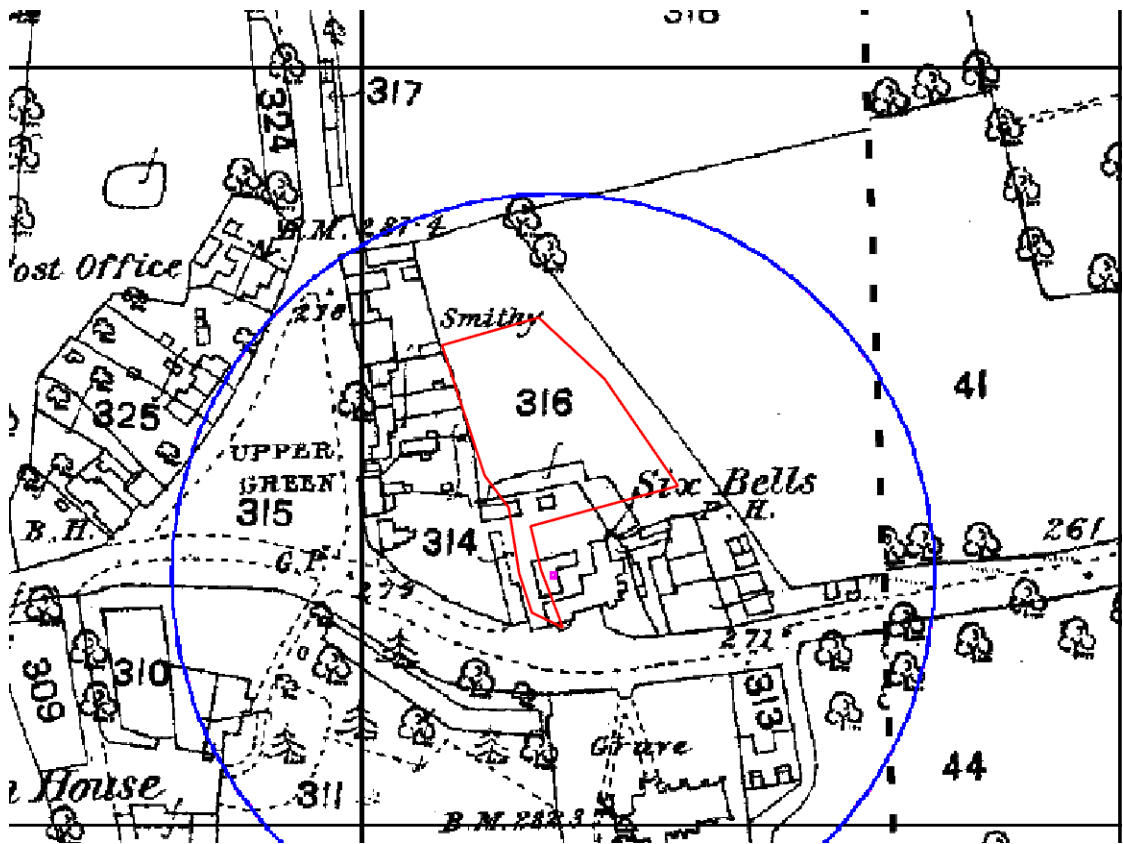


**Historical Map 5:** 2000 Ordnance Survey (Landmark) (1:10,000)

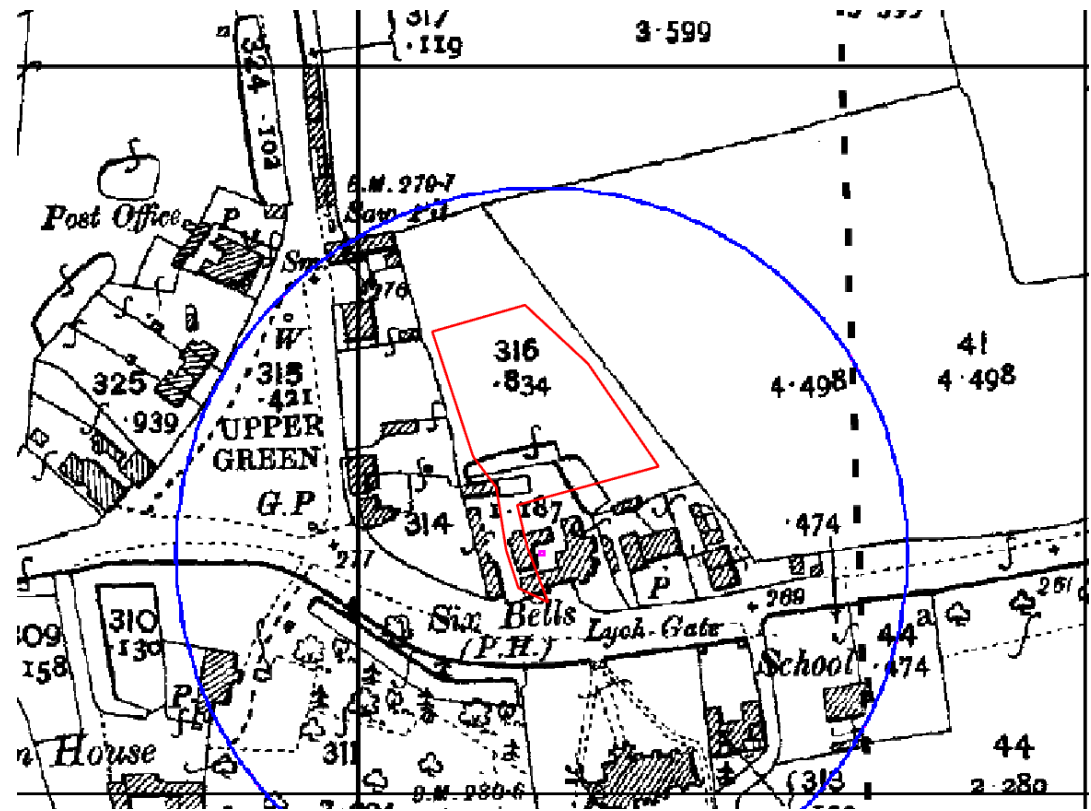


**Historical Map 6:** 2020 Ordnance Survey (Landmark) (1:10,000)

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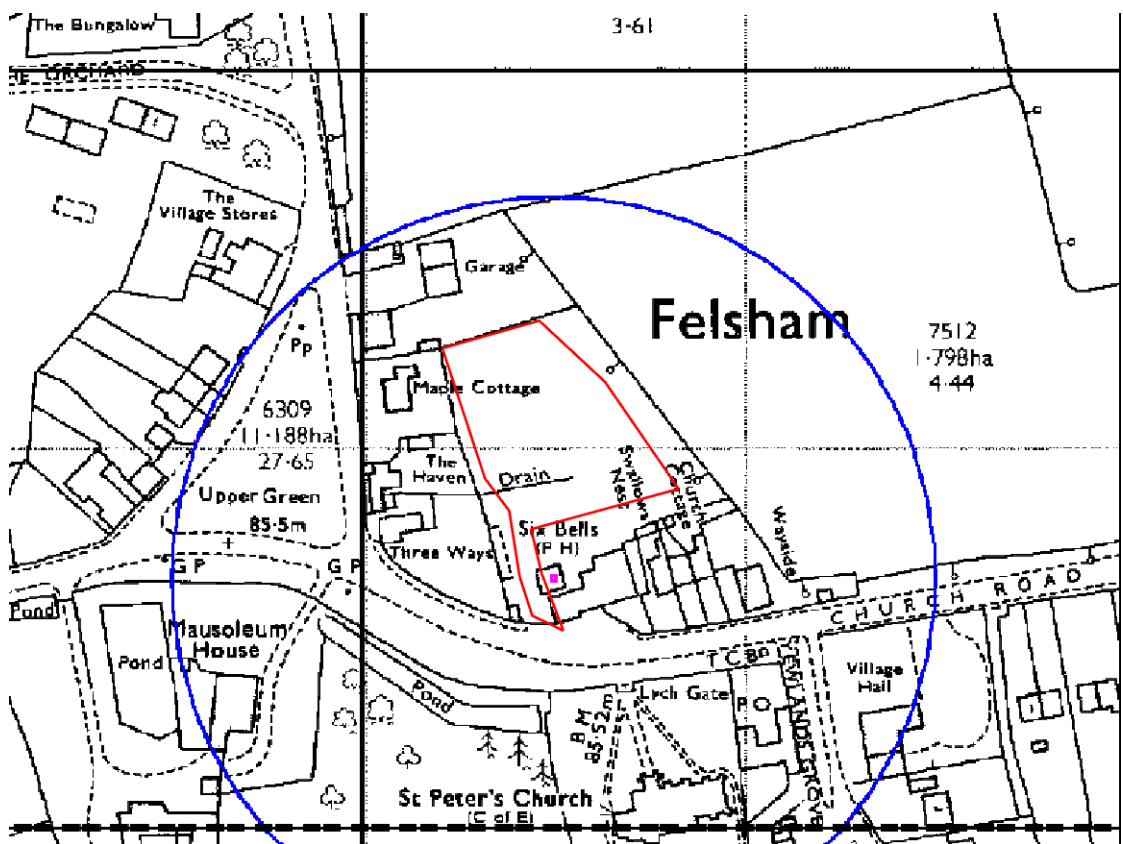
Historical Map 7: 1885 Ordnance Survey (1:2,500)



Historical Map 8: 1904 Ordnance Survey (Landmark) (1:2,500)



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Historical Map 9: 1975 Ordnance Survey (Landmark) (1:2,500)

