



Ms Penny Mills
582746

Direct Dial: 01223

West Suffolk

West Suffolk House
P00591756

Our ref:

Western Way

Bury St Edmunds

Suffolk

IP33 3YU
2017

26 July

Dear Ms Mills

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**MILDENHALL HUB, SHELDRIK WAY, MILDENHALL, SUFFOLK
Application No. DC/17/1106/FUL**

Thank you for your letter of 21 July 2017 regarding further information on the above amended application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Summary

The proposed development would comprise a new public services hub building, with associated hard and soft landscaping. It is located to the west of the Mildenhall, adjacent to the west and south-west boundaries of the Conservation Area, and within the setting of the grade I listed Church of St Mary. Historic England has previously been consulted on these proposals at pre-application stage and on this application prior to the amendments included with this consultation request.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



EAST OF ENGLAND OFFICE

On the basis of what has now been provided, and our own understanding of the Site and its context, we consider that the proposed development would result in harm, in terms of the National Planning Policy Framework (NPPF), to the significance of St Mary's church and the Mildenhall Conservation Area owing to development in their setting.

Historic England Advice

The application Site is bound by a short section of the West Row Road, allotments and open fields to the north, open fields to the west, the River Lark, a cricket ground and open fields to the south, and an area of twentieth century housing to the east. The Site lies within the setting of the Mildenhall Conservation Area and the grade I listed St Mary's Church, which are both to the east of the Site, and also within the wider setting of the grade II listed Wamil Hall to the west. The south-western part of the Conservation Area protrudes beyond the housing at Wamil Court adjacent to the Site's south-eastern corner. The nearest designated heritage asset is the Scheduled Dovecote, which is not considered to be affected.

The proposal comprises the construction of a new Public Services Hub to relocate the existing services in Mildenhall, with the exception of the Fire Service, to this location. The proposal consists of a single building of between two and three storeys in height, with accompanying hard and soft landscaping, including sports pitches, car parking and attenuation ponds. Access to the Site would be from the north and east, and the existing public footpath in the site would be relocated to the north.

The amendments to the application following the Fire Service's withdrawal from the scheme are minor, including some changes to the surrounding landscaping, internal layout of the office accommodation and a change to the fenestration layout of the academy west layout. We do not consider these amendments in themselves to alter our position on this application. Following our comments on 20th June 2017, we note the provision of the additional information submitted as part of the revised and updated heritage statement, in particular the inclusion of an assessment of key views towards Mildenhall from the west.

On the basis of what we have received, and our understanding of the Site, the additional information has clarified our position that the proposal would result in harm to heritage significance. The views assessments included in the revised heritage statement indicate that the location and massing of the proposed hub building, whilst allowing elements of the Grade I listed Church of St Mary's tower to remain visible above its roofline, would nonetheless obscure a significant proportion of it from view in some important views from the west, and it is considered that the wider development would have a negative effect on the appreciation of the church within its rural landscape setting. In particular the proposal would affect the view along the existing public footpath (View 3 in the Development Brief and View 4 in the revised heritage statement), but it would also detract from other views towards the church and the



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk

EAST OF ENGLAND OFFICE

Conservation Area along the River Lark (View 2 in the Development Brief). The proposals in general, which include areas of hard landscaping and sports fields as well as the principal structure, would, despite the mitigation set out in the revised heritage statement, contribute to the erosion of the wider rural setting of the Mildenhall Conservation Area and Church of St Mary in this location.

The National Planning Policy Framework identifies protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 6, 7 and 14). The conservation of heritage assets is a core principle of the planning system (paragraph 17) upon which the NPPF places great weight (paragraphs 17 and 132). Clear and convincing justification should be made for any harm to the significance of heritage assets (paragraph 132). Paragraph 128 of the NPPF requires applicants to describe the significance of heritage assets affected by proposed development and the contribution their setting might make to that significance. Sufficient information should also be provided to enable an understanding of the potential impact of the development on the asset. Local authorities should take the assessment of significance into account when considering the impact of a proposal on a heritage asset (paragraph 129). Where a development proposal will lead to less than substantial harm to the significance of heritage assets, that harm should be weighed against the public benefits of the proposals (paragraph 134).

Recommendation

Historic England has concerns regarding the application on heritage grounds, owing to the harm caused by the proposal to the setting of the Grade I listed Church of St Mary and to the setting of Mildenhall Conservation Area. We consider that the issues outlined in our advice need to be assessed, and that steps should be taken where possible to minimise any impact of the proposals. We emphasised previously that paragraph 132 of the NPPF requires a clear and convincing justification for any harm or loss to the significance of heritage assets and we note that the appropriate section of the revised heritage statement has been updated and improved to better articulate this information. Moreover, any harm to heritage significance identified should be weighed against the public benefits of the proposals in order to meet the requirements of the NPPF. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Historic England

EAST OF ENGLAND OFFICE

Yours sincerely

Edward James

Historic Places Advisor, East of England

E-mail: Edward.James@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749

HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.