

# Heritage Impact Assessment

Humber Doucy Lane  
Ipswich  
Suffolk

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## EXECUTIVE SUMMARY

This Heritage Impact Assessment (HIA) was commissioned by Ipswich Borough Council, having identified a site of 23.62 hectares north of Humber Doucy Lane for development within the emerging Ipswich Local Plan Review 2018-2036. The residential allocation falling within the Borough boundary is for 496 dwellings on 60% of the site (ref.ISPA4.1), and a further 150 dwellings are proposed on the East Suffolk (former Suffolk Coastal District) side, within the parish of Tuddenham (ref. SCLP12.24).

The purpose of the HIA is to identify the heritage assets likely to be affected by the proposal, to assess their significance and the contribution made by their setting to that significance. The resulting Assessment will inform discussion at the forthcoming examination hearings and recommendations made in the HIA will be incorporated into the emerging Local Plan to inform the master planning of the site. Judgements made in the HIA solely concern the impact of development on above ground heritage assets. An archaeological assessment does not form a part of the HIA.

The selection of affected heritage assets follows the advice contained in Historic England's *The Historic Environment and Site Allocations in Local Plans: Historic England Advice Note 3*. Definitions of 'heritage asset', 'setting' and 'significance' are as contained in the glossary (appendix A) to the National Planning Policy Framework and assessment follows the guidance contained in Historic England's advice notes: *The Setting of Heritage Assets*: and *Managing Significance in Decision-Taking in the Historic Environment*.

Development of the land could affect the setting of four listed buildings (designated heritage assets) and an additional four may also be affected in a wider context. Additionally a further three non-designated heritage assets have been identified.

For the purposes of assessment, the HIA divides the allocation into four areas. In each, sites of sensitivity to the setting of heritage assets are identified, together with important views and 'area of opportunity' where development could proceed without causing harm to the significance of heritage assets. The HIA also discusses the wider historic landscape and identifies constraints that this imposes. To that end reference is made to the *Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich* (July 2018).

The HIA concludes that the proposed development of parts of the allocated land off Humber Doucy Lane could be harmful to the setting of designated and non-designated heritage assets. Development of the areas identified as 'sensitive' would cause significant levels of harm not only to the setting of heritage assets but also to the wider countryside setting. Whilst this level of harm might be, in terms of the NPPF, 'less than substantial', the level of less than substantial harm would still be high. The HIA identifies areas for development opportunities, particularly in assessment area (C), where housing of appropriate design could proceed without harming heritage assets.

On the other hand, assessment areas (A), (B) and (D) are particularly sensitive and whilst secondary recreational uses may be possible without causing significant harm, vehicular access to Tuddenham and Seven Cottages Lane and the bridleway to Allen's House would be harmful. The HIA provides a broad assessment of the allocation. Any subsequent planning applications which result will require full heritage statements to support their detailed proposals.

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## 1.0 Introduction

- 1.1 I have been instructed by Ipswich Borough Council to prepare a heritage impact assessment (HIA) for land north of Humber Doucy Lane. The land, comprising around 23.62 hectares, has been identified for development within the emerging Ipswich Local Plan Review 2018-2036. The residential allocation falling within the Borough boundary is for 496 dwellings on 60% of the site (ref. ISPA4.1). The remaining 40% of the site would accommodate 'secondary uses' including a green rim trail, highways improvements, early years setting, sports pitches, suitable alternative natural green space (SANGS) and associated infrastructure. A further 150 dwellings are proposed on the East Suffolk (Suffolk Coastal District) side, within the parish of Tuddenham (ref. SCLP12.24).

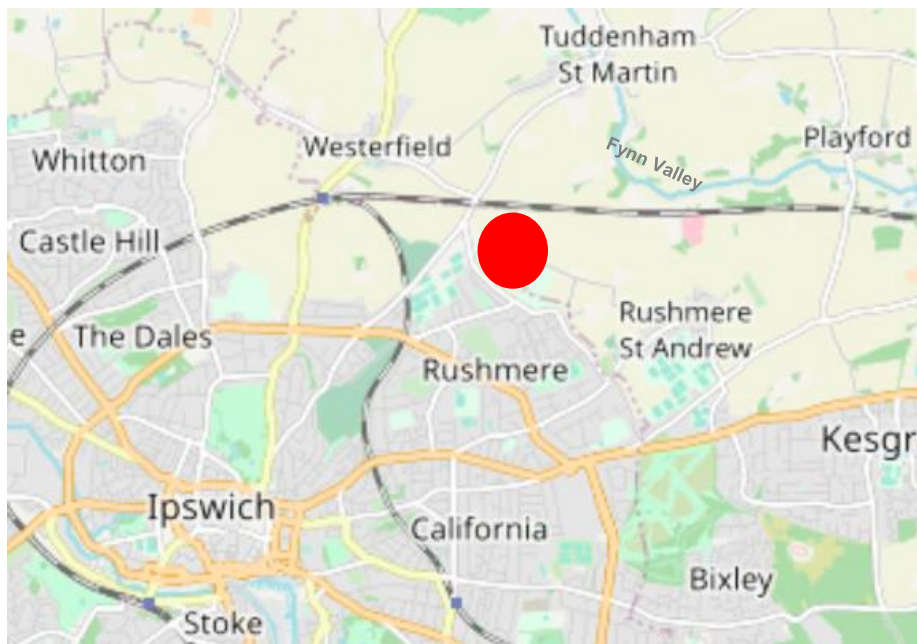


Fig. 1 Site Location

- 1.2 The site is located to the north-east of Ipswich along Humber Doucy Lane. It comprises largely arable farm land, relatively flat some 35 metres OD. *The North-East Ipswich Urban Characterisation Study SPD*, published by the Borough Council, describes Humber Doucy Lane as part of the 'rural edge',
- ...a narrow road with some open views across fields to the east. To the north of Humber Doucy Lane is the Grade II listed Westerfield House, a large 18<sup>th</sup> century house with an older 16<sup>th</sup> century core, occupying a prominent position in the landscape. Westerfield House has an isolated setting, being separated from the 20<sup>th</sup> century development further south, which reinforces the prominence of the building. The edge of the Rushmere estate forms the west side of much of Humber Doucy Lane, and provides countryside views looking east.*
- 1.3 This study, together with the *Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich vol. 1: Landscape Fringes of Ipswich*, produced for the Borough Council by Alison Farmer Associates in July 2018, informed the initial allocation.

- 1.4 The allocation site lies within the borough boundary and adjoins land within the parishes of Tuddenham St Martin and Rushmere St Andrew. Both of these parishes are within East Suffolk and it is the intention to master plan the site with East Suffolk. The map below shows the area within East Suffolk hatched in pale blue.

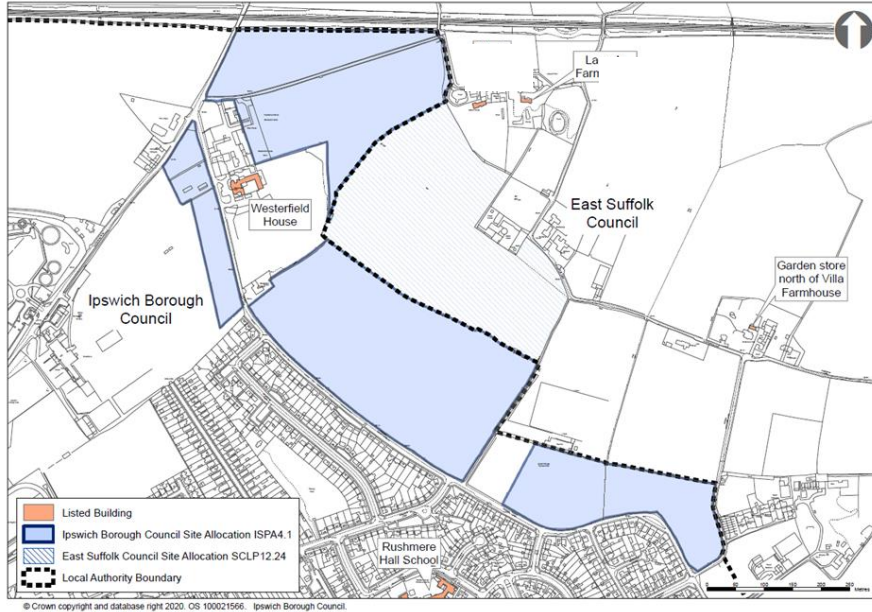


Fig. 2 The site, showing the Borough boundary

- 1.5 The resulting HIA will inform discussion at the forthcoming examination hearings and recommendations made in the HIA will be incorporated into the emerging Local Plan to inform the master planning of the site. An archaeological assessment does not form a part of the HIA.

## 2.0 Methodology

- 2.1 The purpose of this heritage impact assessment (HIA) is to provide an understanding of the important heritage assets of the study area and their value and the potential impact of the development of the allocation. It identifies the significance of historic assets and their setting and assesses the harm which may arise from the cumulative effect of the development, as well as identifying opportunities for avoidance, mitigation and enhancement.
- 2.2 The HIA follows the advice contained in Historic England's *The Historic Environment and Site Allocations in Local Plans: Historic England Advice Note 3*. The intention is to ensure that the emerging Local Plan sets out a positive strategy for 'the conservation and enjoyment of the historic environment, in which the desirability of sustaining and enhancing the significance of heritage assets should be considered (NPPF paragraph 126)'. The HIA advises how development can avoid or minimise conflict between the conservation of identified heritage assets and the proposed development, taking into account an assessment of the significance of the heritage assets (NPPF paragraph 129).
- 2.3 To this end, a four step approach has been adopted, following Historic England's guidance:
- **STEP 1** Identify which heritage assets are affected by the potential site allocation Informed by the evidence base, local heritage expertise and, where needed, site surveys  
Buffer zones and set distances can be a useful starting point but may not be appropriate or sufficient in all cases Heritage assets that lie outside of these areas may also need identifying and careful consideration.
  - **STEP 2** Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s) including:  
Understanding the significance of the heritage assets, in a proportionate manner, including the contribution made by its setting considering its physical surroundings, the experience of the asset and its associations (e.g. cultural or intellectual)  
Understanding the relationship of the site to the heritage asset, which is not solely determined by distance or inter-visibility (for example, the impact of noise, dust or vibration)  
Recognising that additional assessment may be required due to the nature of the heritage assets and the lack of existing information  
For a number of assets, it may be that a site makes very little or no contribution to significance.
  - **STEP 3** Identify what impact the allocation might have on that significance, considering:  
Location and siting of development e.g. proximity, extent, position, topography, relationship, understanding, key views  
Form and appearance of development e.g. prominence, scale and massing, materials, movement

Other effects of development e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability and communal use

Secondary effects e.g. increased traffic movement through historic town centres as a result of new development

1. STEP 4 Consider maximising enhancements and avoiding harm through:

Maximising Enhancement

- Public access and interpretation
  - Increasing understanding through research and recording
- Repair/regeneration of heritage assets
- Removal from Heritage at Risk Register
- Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design

Avoiding Harm

- Identifying reasonable alternative sites
- Amendments to site boundary, quantum of development and types of development
- Relocating development within the site
- Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings
- Addressing infrastructure issues such as traffic management

- 2.4 Step 5, involving the determination of whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness forms a conclusion.
- 2.5 The identification of the heritage assets likely to be affected involved an initial desk – top assessment using The National Heritage List for England, the Suffolk Historic Environment Record and old maps. This initial 'wide search' excluded buildings and structures within the existing urban area, unless they boarded the allocation site or appeared as landmarks. This acknowledged that the setting of heritage assets within the town is different from that in the countryside and the search included the parishes of Westerfield, Tuddenham St Martin and Rushmere St Andrew – all within East Suffolk beyond the Borough boundary.
- 2.6 This search revealed a total of eight designated heritage assets which could be affected by residential development off Humber Doucy Lane. Of these, two, Rushmere St Andrew church and the war memorial in its churchyard are least likely to be affected, though the church tower provides a local landmark. Similarly, Hill Farmhouse and its barn, also within Rushmere St Andrew parish, are not visible from the allocation site, but the setting of Hill Farm is experienced within a wider setting, which includes other designated heritage assets to the east of the allocation site.
- 2.7 A similar approach was used to identify non-designated heritage assets, but making use of Ipswich Borough Council's *Local List (Buildings of Townscape Interest) Supplementary Planning Document* (2013 and subsequent revisions) and East Suffolk's criteria for the identification of non-designated heritage assets, which follows Historic England's *Good Practice Guide for Local Heritage Listing*. This

search failed to identify any buildings on the local lists apart from Westerfield Farm, which appears on the Suffolk Historic Environment Record (SHER IPS2086). Buildings occurring on nineteenth century maps were added to the search and assessed in accordance with local listing criteria:

- Is it the work of a particular architect of regional or local note?
- Does it have landmark quality, or contribute to the quality of recognisable spaces, by virtue of its function, location, age, design or features?
- Does it provide a good example of a particular type or form of building or of an age, architectural style, building construction or design, which is locally rare?
- Does it contribute to the character of an area or to the setting of the local scene by forming a focal element in a group, park, garden or other townscape or landscape, or by sharing particular architectural form or details with other buildings nearby?
- Has it significant historic associations with local people or past events?
- Does it individually or as part of a group, serve as a reminder of the gradual development of the settlement in which it stands, or of an earlier phase of growth?
- Does it contribute to the character or appearance of a conservation area?
- If the structure is associated with a designated landscape, such as walls, terracing or minor garden buildings, is it of identifiable importance to the historic design?
- Has it received an award in recognition of the quality of its architectural design or other significance from a body of recognised local, regional or national standing?

- 2.8 As a result a further three buildings on the site's periphery were identified: Villa Farmhouse, the Water Towers and 'Seven Cottages'.
- 2.9 Having identified the heritage assets, the next step involved identifying the significance of the heritage assets in a proportionate manner. This included forming an understanding of the historic context of the site and its contribution to the setting and overall significance of the heritage assets.
- 2.10 The impact of development on the identified significance was then discussed and the level of harm identified and the degree to which harm could be minimised and enhancement maximised.
- 2.11 The site was visited on the 2<sup>nd</sup> September 2020 during sunny weather.
- 2.12 The site allocation has been divided into four areas for assessment purposes. This has been done to take account of the fragmented nature of the allocation and the differing impacts each area has on heritage assets. These areas are shown on fig. 3 below. The first includes land surrounding Westfield House (on its north, east and south sides), excluding the allocation within East Suffolk, south-west of Allen's and Lacey's Farms. For ease of reference, this is noted in this assessment as area (A). It comprises large arable fields bounded to the north by the railway line. Largely flat at around 45 metres AOD, it falls away gently eastwards, beyond Lacey's Farm towards the shallow valley of the River Fynn.
- 2.13 The second area (B), lies across the road to the west of Westfield House and comprises a narrow roadside field, with a low roadside hedge and poplar trees along its west boundary, and a pair of smaller paddocks with overgrown hedges surrounding them at the Tuddenham Road junction.



- 2.14 Area (C) comprises a large arable field on the north-east side of Humber Doucy Lane, to the south-east of Westerfield House. Its northern edge is formed by the borough boundary, beyond which lies the East Suffolk allocation site.
- 2.15 Area (D) lies to the south on the north side of Humber Doucy Lane where it takes a curve to the north-west. The site, an arable field, is bounded on the north by Ipswich Rugby Ground and on the east by Seven Cottages Lane. Its western boundary is east of a hedgerow and trees along a public right of way passing the rugby club in the direction of Tuddenham Lane.

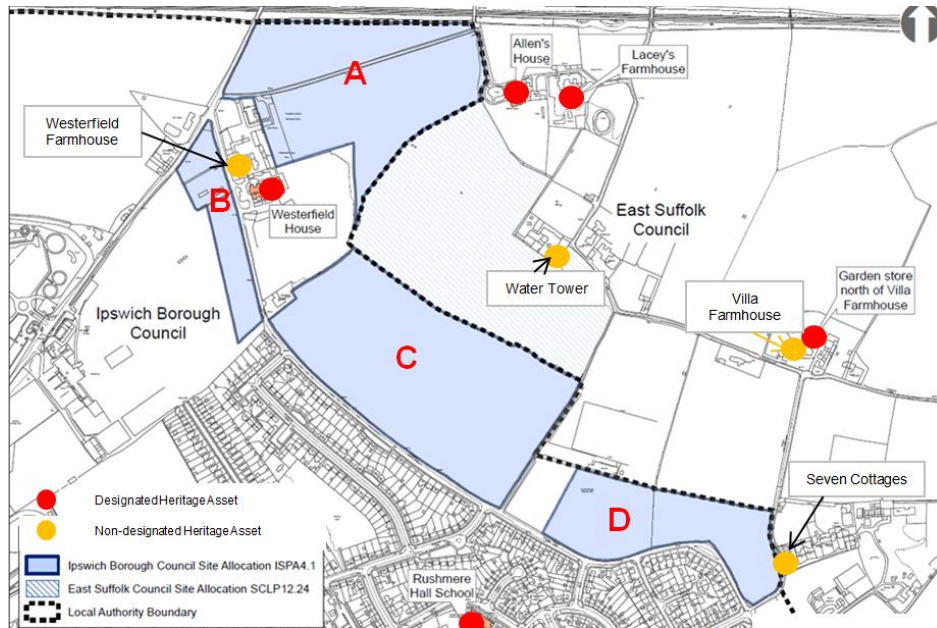


Fig. 3: The Allocation and Assessment Areas

### 3.0 Heritage Assets: Context, Setting and Significance

#### Context

- 3.1 The context of a heritage asset is the relationship between it and other heritage assets, which are relevant to its significance. Historic England explains that this relevance applies irrespective of distance, extending well beyond what might be considered an asset's setting and can include the relationship of one heritage asset to another of the same period or function.<sup>1</sup> In this case the historic context of heritage assets can be understood with reference to the urban edge of Ipswich and its relationship with the wider countryside stretching north-eastwards to the Fynn Valley in East Suffolk. The inter-relationship between sixteenth century farm buildings scattered over a wide area can be placed in this context and the surviving historic settlement pattern forms part of the setting and significance of the heritage assets. The Tuddenham Conservation Area Appraisal notes that

*The valley and tributaries of the River Fynn are designated as a Special Landscape Area in the Suffolk Coastal Local Plan. This is in recognition of its special landscape attributes, which are particularly vulnerable to change.<sup>2</sup>*

- 3.2 As Frank Grace notes in his book *The Growth of Modern Ipswich*, Pennington's town map of 1778 shows little change in the size and shape of Ipswich from that drawn by John Speed in 1610.<sup>3</sup> Growth came after the advent of the Wet Dock and the arrival of the railways in the nineteenth century. Further expansion in the twentieth century, particularly the second half, witnessed substantial growth on both west and east sides, including towards the north-east, but the eastern side of Humber Doucy Lane remained largely undeveloped and the road itself marked the urban edge of the town, as it still does.

- 3.3 Pennington's map does not extend as far as the modern urban edge, but the wider map of Suffolk produced by Hodkinson in 1783 does. It shows the area north-east of the town, towards Westerfield and Tuddenham, depicting country houses, villages and churches, but not isolated farms. However, it clearly shows Humber Doucy Lane, tree-lined, with Westerfield House occupied by Henry Collet Esquire.

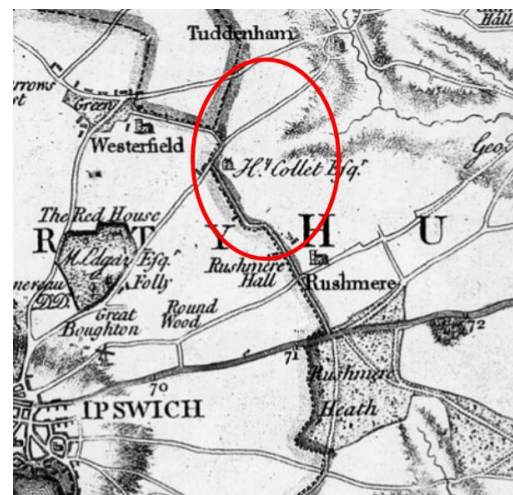


Fig. 4 Hodkinson's Map 1783  
Showing Westerfield House and the tree-lined Humber Doucy Lane

<sup>1</sup> Historic England *The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning 3* 2015

<sup>2</sup> East Suffolk Council *Tuddenham St Martin Conservation Area Appraisal* March 2016 p.3

<sup>3</sup> Grace, Frank *The Growth of Modern Ipswich* in Dymond & Martin *An Historical Atlas of Suffolk* (Suffolk CC 3<sup>rd</sup> edition 1999) Chapter 73

- 3.4 The street name 'Humber Doucy' is unusual. It is said to derive from the French *ombre douce* (sweet shade) and was so-called by French prisoners during the Napoleonic Wars of the early nineteenth century, welcoming the cool shade of the trees as they were marched to their enforced labour, presumably in the fields<sup>4</sup>. The name was anglicised to Humber Doucy and it stuck, but sadly many of the trees, shown so clearly on the 1783 map, have not survived, possibly removed during highway improvements or during the construction of houses from the early twentieth century.
- 3.5 The tree-lined lane is shown on the first edition OS map of 1884, though maps from 1904 show fewer. Gradually during the century housing development continued north-eastwards from Ipswich into the Rushmere Hall estate. Further north a street of bungalows (Sherborne Avenue) was built and shortly after the Second World War, land was cleared between the avenue and Humber Doucy Lane for the construction of prefabs. This is shown on the 1945 aerial photograph below.

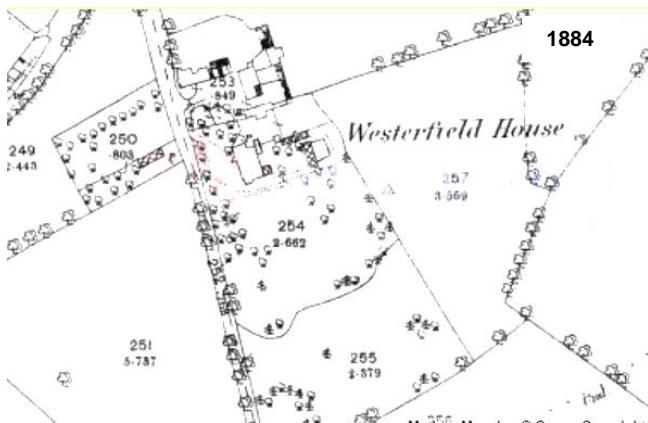


Fig.5 1884 map showing tree-lined Humber Doucy Lane



Fig. 6 1945 Aerial photograph

- 3.6 The aerial photograph shows a row of mature trees alongside Humber Doucy Lane and it seems that the design of the development sought to keep them. Some mature trees survive, which may be remnants of the eighteenth century *ombre douce*.



Fig. 7 Humber Doucy Lane looking north

<sup>4</sup> Ipswich Street Names Derivations <http://www.ipswich-lettering.co.uk/streetnames.html> (accessed 9/8/2020)

- 3.7 The study area extends eastwards from Humber Doucy Lane to the borough boundary. As the *Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich* notes, the area comprises ‘the plateau farmland between the existing urban edge of Ipswich and the Fynn valley to the north’.<sup>5</sup> The land, although elevated, is relatively flat and enclosed by mature hedgerows.
- 3.8 Areas (A) & (C) have changed comparatively little since the 1783 map. Fields have been enlarged and hedges removed, but the overall historic field pattern is similar to that shown on the nineteenth century OS maps. The eastern side, within East Suffolk, is characterised by isolated farmsteads situated along a network of narrow country lanes, Lamberts and Tuddenham Lanes for example. The network of lanes continues into area (D). Seven Cottages Lane marks its eastern boundary and a pair of parallel footpaths to the west of the lane, also link Humber Doucy Road to Tuddenham Lane. These form part of the historic track network, the eastern path continuing north beyond Tuddenham Lane and the west path is now partly the access to Ipswich Rugby Club.

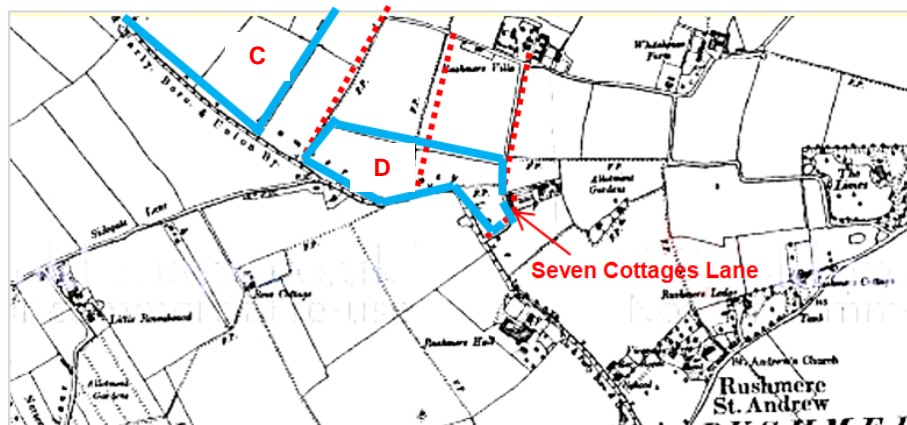


Fig. 8 1926 map showing footpaths (dotted red lines) from Humber Doucy Lane to Tuddenham Lane

- 3.9 The early maps show a row of farmsteads along Tuddenham and Lambert's Lanes, separated by a low ridge from the Fynn valley which lies to the north. From west to east, these comprise: Allen's and Lacey's Farms, Villa Farm (known as Rushmere Villa Farm on early maps) – all in Tuddenham parish-and Whitehouse Farm (now known as Hill Farm) in Rushmere St Andrew parish. Each of these farmsteads contains listed buildings, described below.

<sup>5</sup> Alison Farmer Associates *Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich vol. 1: Landscape Fringes of Ipswich* (July 2018)

## Designated Heritage Assets

- 3.10 The position of designated assets in relation to the allocation site is shown below. All are grade II listed buildings. The reasons for selecting these individual buildings are explained in the foregoing section 2 'Methodology'.



Fig. 9 Designated Heritage Assets

### 1. Westerfield House

#### Brief History & Description

- 3.11 Westerfield House was first listed, grade II on the 16<sup>th</sup> March 1966 as Everton School, Westerfield House. The list description reads as follows:

*A late C18 red brick house. 2 storeys and attics. A brick canted bay rises through 2 storeys at the north end, double-hung sashes with glazing bars. The other windows on the west front have pointed arched heads and pointed arched lights. The doorway is approached by stone steps and has a wood doorcase with a semi-circular fanlight with ornamental glazing bars, panelled reveals, panelled pilasters and a modillion cornice. The south front has 4 window range, double-hung sashes with glazing bars, in plain reveals on the 1st storey and French casements on the ground storey. Roof tiled, hipped, with 3 flat headed dormers on the west front.*

- 3.12 Although not mentioned in the list description, Westerfield House has the remains of a sixteenth century house within the existing building, forming a part of its rear wing. It was built in the eighteenth century for the Collett family and is shown on Hodkinson's map of 1783. Antony Collett held the manor of Westerfield from the early seventeenth century and it remained with the family throughout the eighteenth century.<sup>6</sup> Hodkinson notes on his map that Westerfield House was occupied by Henry Collett, who was Clerk of the Peace for Suffolk for over fifty years and died at Westerfield House in 1802<sup>7</sup>.

<sup>6</sup> Copinger, W.A. *The Manors of Suffolk; Notes on their History and Devolution vol. 2 The Hundreds of Blything and Bosmere and Claydon* 1905 p.368

<sup>7</sup> *Ibid.* p.369

- 3.13 It seems that after Henry's death, Westerfield House was let initially and later sold. By 1892 it was occupied by Alexander Fraser<sup>8</sup>, who then sold it in 1908. The sale particulars include land in Westerfield, Tuddenham and Rushmere and a 'residence known as Westerfield House, stabling, pleasure grounds, tennis and croquet lawns, kitchen and fruit gardens, farm buildings, bailiff's house'; the estate comprising 90 acres<sup>9</sup>.



Fig. 10 Westerfield House from the north-west



Fig. 11 From the south-west

- 3.14 When it was again sold in 1920, it was sold in individual lots. The sale particulars recorded 'with gardens, paddock and stabling, 9 acres (lot 1); Westerfield House Farm, with cottage, farm buildings and 80 acres of land (lot 2)'.<sup>10</sup> The farm was acquired by John Sherwood and after his death in 1942, it was again sold 'with three good cottages'.<sup>11</sup>
- 3.15 The House became a private boarding school for boys, known as Everton House and its gardens were laid out as sports pitches. The school closed around 1979 and attempts were made to continue a sports educational role with its use as an international football school, a goalkeeper training centre and a visiting football centre and hotel. It was during its occupancy as a school that the rear 1930s extension was built.
- 3.16 After it finally closed as a school, it became the Westerfield Hotel and in 2011 planning permission was granted to convert it to a care home for 31 occupants.<sup>12</sup>
- 3.17 In 2018 outline consent was granted for a 'care village' comprising the residential care home, "including up to 147 assisted living/extra care units and 2 associated staff/director dwellings."<sup>13</sup>

<sup>8</sup> Kelly's *Directory & Gazetteer of Norfolk & Suffolk 1892* p. 1251

<sup>9</sup> Suffolk Record Office (SRO) HD2833/2/SC242/31/3

<sup>10</sup> SRO HE402/1/1920/69

<sup>11</sup> SRO :HE402/1/1942/23

<sup>12</sup> 11/00066

<sup>13</sup> 18/00526/OUT

## Setting & Significance

3.18 The setting of a heritage asset is defined in the National Planning Policy Framework as:  
*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.*

3.19 Significance is defined in the NPPF as:  
*The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.*

3.20 In other words, it's not simply the visual aspect of views to and from the heritage asset which defines its setting, it is also the manner in which the asset may be experienced and understood. The significance of a heritage asset may derive from its setting as much as its intrinsic heritage value.

3.21 Westerfield House and the adjoining former farm buildings still retain the characteristics of a country residence with its farm despite many alterations, particularly during the twentieth century. Originally, the house was one of a series of isolated farmsteads and it has historical significance in its sixteenth century date, which it shares with the other farmsteads to the east. The replacement house for the Collett family of the mid-eighteenth century has historic and architectural significance, which can still be appreciated. This house looked south across its pleasure gardens and westwards across open countryside, with its farm on the north side and kitchen gardens to the east.

3.22 The gardens were lost some time after the sale in 1920 and the setting of Westerfield House has undergone much change in the intervening years. Much of the surrounding trees and hedges, which contributed to the sense of isolation have been removed initially to make way for sports pitches, and the building was extended in the 1930s to accommodate its boarding school use. It was further extended in more recent years, notably with a large rear wing built in the 1980s for hotel accommodation.



Fig. 12 1980s hotel extension

3.23 The result was an alteration to the setting and the sense of isolation, which contributed much to its appreciation, was further altered with the changes of use to the adjacent farm buildings and development within the house's former stable yard. A 'complex' has appeared and this will be further increased with the addition of new accommodation required to create the 'Westerfield House Care Village', recently given outline approval. This represents the latest iteration of the setting.

3.24 These relatively recent and proposed additions are of no intrinsic significance in themselves, but cause a degree of cumulative harm to the overall setting, which is so important to the significance of this heritage asset. The loss of seclusion by the removal of trees and hedges will be increased by the recent approval of dwellings to the south of Westerfield House involving the removal of the roadside hedge to create a pavement.



Fig. 13 View 1  
Site for Care Home units & remains of tree cover



Fig. 14 View 2  
Roadside hedge to be removed



Fig. 15 View 3  
Development of former stable yard



Fig. 16 View 4  
Westerfield House & farm 'complex'  
from bridleway



Fig. 17 View 5  
Eastern edge of Westerfield House from bridleway

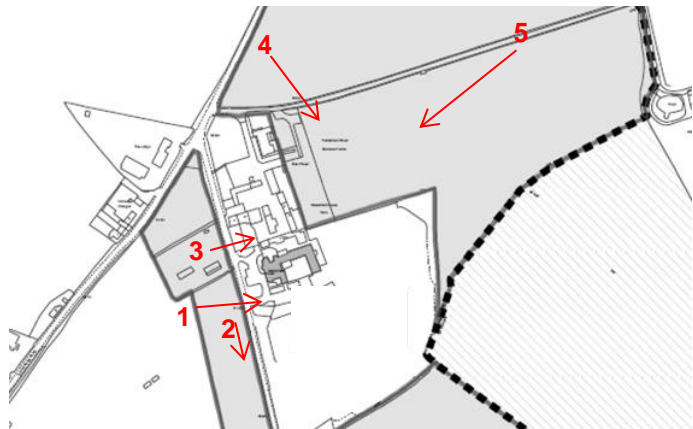


Fig. 18 Position of Views 1 to 5



## 2. Allen House & Lacey's Farmhouse

### Brief History & Description

- 3.25 These two buildings form part of a pair of adjoining former farmsteads, dating from the sixteenth century and situated in the south-west of the parish of Tuddenham St Martin in East Suffolk, to the north-east of Westerfield House and just south of the modern railway line. Both properties are secluded with limited public view and are sited along a bridle path which runs from Tuddenham Lane westwards between the outbuildings to Lacey's Farmhouse and past Allen's House to Tuddenham Road. The eastern end of the path is an unsurfaced track giving access to Lacey's Farmhouse, whilst the eastern end is a concrete track giving access to Allen's House and its former barn, which has been converted to a dwelling (Meadow Barn).



Fig.19 Track running west between Lacey's Farm buildings



Fig. 20 'Meadow Barn' conversion from bridleway

- 3.26 Both Allen's House and Lacey's Farmhouse are grade II listed buildings, the list description for Allen's House reads as follows:

*House. Mid C16 with extension of early C17, and alterations of C19 and early C20. 2 storeys. Hall range, with parlour cross-wing extension to right. Timber-framed and plastered; on the side wall of the parlour wing is a C17 pargetted cartouche, containing a damaged design in high relief, perhaps an achievement. Smaller motifs are reset in later external plastering. Front wall of main range rebuilt C19 up to 1st floor in flint with painted brick quoins. Plaintiled roofs, the cross-wing hipped. Internal and rear chimneys of red brick, the C17 parlour wing stack has a pair of square diagonally-set flues on a plinth with moulded cornice. Mainly C19 and early C20 casements. In the cross-wing are exposed C17 ovolo-moulded mullioned windows of 3-lights, which originally flanked larger windows now blocked. Boarded and battened oak entrance doors, early C20 or C17 restored. The main range has plain substantial framing of C16 and was originally a 3-cell house. In the cross-wing is an original newel stair with turned balusters. The parlour and chamber above both have moulded plaster ceilings, with motifs matching those on external walls. A small C17 lean-to wing at rear is probably a garderobe tower.*



Fig. 21 Allen's House from bridle path

### 3.27 Lacey's Farmhouse to the east is described as:

*Farmhouse. Early C16 with alterations of later C16 and c.1970. 2 storeys. Originally of 2-cell cross-passage plan form. Timber-framed and plastered. Hipped thatched roof with internal chimney of red brick. C20 casements with leaded lights. C20 boarded entrance doors. Good quality timber-framing fully exposed internally. Of the 1st phase is a blocked cross-passage doorway with 4-centred arched head, and a pair of service room doorways, one complete. Several blocked diamond-mullioned windows. Parlour cell added later C16, with exceptionally close studding and moulded mullioned windows; chimney inserted between hall and parlour with back-to-back open fireplaces. Left-hand cell C19, with oak framing introduced c.1970. Projecting wing to right added during restoration of c.1970*



Fig. 22 Lacey's Farmhouse from bridle path

- 3.28 Both farms presumably received their names from a former inhabitant, but neither is named on the 1881 map and though Allen's appears in 1904, Lacey's is not named until the 1926 edition.

### Setting & Significance



Fig.23 Position of Allen's House & Lacey's Farmhouse

- 3.29 The inter-relationship between the two listed farmhouses is significant. They are of similar age and have significance in understanding the settlement pattern of the area in the early sixteenth century. They maintain their isolation through the low grade level of access, via the bridleway and the surrounding mature vegetation. More than this, the bridle path connects to a sequence of narrow lanes of which Tuddenham Lane forms a part.

- 3.30 The area lies to the east of the allocation site and is wholly within the boundary of East Suffolk. The main lane, Tuddenham Lane links the village of Tuddenham St Martin in the north with Rushmere St Andrew in the south. The southern section in Rushmere parish is a narrow metalled road, but as it proceeds northwards, it becomes an unmade track with tall hedgerows either side. At its southern end, public footpaths connect it westwards to Humber Doucy Lane. The whole network is significant. Not only is it the remnant of an historic pattern of lanes, it also links the listed farmsteads and consequently forms a part of their setting. The enjoyment of the heritage assets is enhanced by this network, which enables the public not only to access the countryside, but also to appreciate the views and glimpses of these isolated farmsteads.



Fig. 24 Tuddenham Lane looking north towards Lacey's Farm

### 3. Garden Store at Villa Farm

#### Brief History & Description

- 3.31 Villa Farm is situated in Rushmere St Andrew parish, south of Lacey's Farm at the junction of Tuddenham Lane with Seven Cottages Lane. Unlike Allen's House and Lacey's Farmhouse it is not secluded and faces the highway. The farmhouse is not listed, but the garage/store to the rear is a grade II listed building, described as follows:

*Garage and garden store. Built early C16 as a 2-cell open-hall house. Timber framed, weather-boarded at front and plastered at rear; underbuilt C18 and C19 in red brick at both ends. Plaintiled roof (pantiled at rear), half-hipped at the left-hand service end. Various C19 and C20 windows and pair of boarded garage doors. The 2-bay hall remains open to the rafters; the central open truss has an arch-braced uncambered tie-beam, square crown-post with 2-way arch-bracing, and moderate smoke encrustation from the open hearth. At the left-hand end is a single room with lodged upper floor. The tie-beam at the external wall is interrupted for a small 4-light diamond-mullioned window under the eaves (now blocked), which originally lit the attic. There may have been a further 2-storey cell to right of the open hall. Much of the studwork in the external walls was replaced in C18, but otherwise the structure has been little altered since the C16. This survival is probably due to its early replacement by a larger house to which it then became an outbuilding, perhaps a bakehouse or brewhouse.*

## Setting & Significance

- 3.32 The listed building is significant on account of its age and historic interest as the remnant of an open hall. Its timber frame is of particular significance even though its outward appearance is unassuming and utilitarian, now simply an ancillary building to the farmhouse which replaced it in the nineteenth century. Its early sixteenth century roof structure retains smoke-blackened timbers and a crown post, surviving evidence of the open hall house. Its later history, including its adaptation to various roles in association with its replacement house adds to its historic significance. It stands to the rear of the later farmhouse and forms an attractive ensemble viewed across the nearby pond.



Fig. 26 Store at Villa Farm (Winter image from Google Earth)

- 3.33 As is the case with Allen's House and Lacey's Farmhouse, the setting of Villa Farm has significance in its position along the network of lanes and as one of a series of farmsteads of sixteenth century date. Its setting is not simply its immediate surroundings, but also its position in context with the other farmsteads as a part of a historic landscape and settlement pattern.
- 3.34 It forms a group with a modern house a short distance across the road to the west, and also with cottages leading eastwards to the grade II listed Hill (formerly Whitehouse) Farmhouse and barn. Although distant from the allocation site, Hill Farm's setting has significance as another component of the historic settlement pattern. The *Farmsteads in the Suffolk Countryside Project* conducted by Suffolk County Council Archaeological Service in 2019 recorded that all five farmsteads were substantially complete, even though some buildings had undergone residential conversion.<sup>14</sup>



Fig. 27 Location of the C16 Farmsteads

<sup>14</sup> Viz. Suffolk Historic Environment Record (SHER) IPS2086; TDM057; TDM056; RMA031 & RMA057

## Non-Designated Heritage Assets

3.35 The selection of these non-designated heritage assets is explained in the foregoing section 2 'Methodology'. None of the buildings have been identified as 'Buildings of Local Interest' by the Borough or District Councils, but all have some visual and historic interest which makes a positive contribution to the locality.

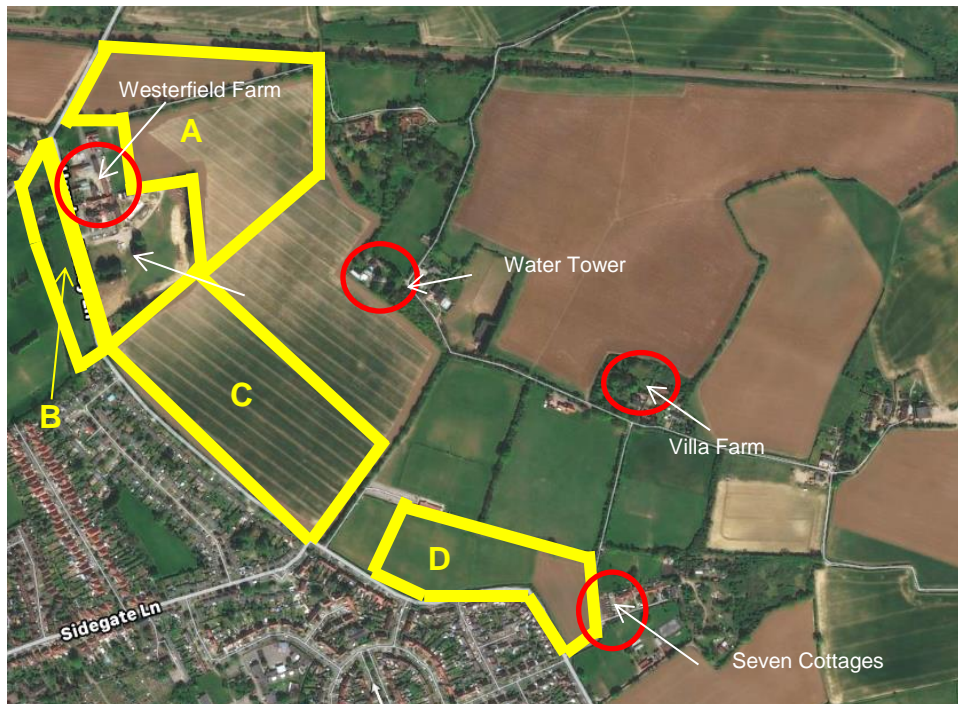


Fig 28. Location of non--designated heritage assets

### 1. Westerfield Farm

3.36 The farmhouse was probably built at the same time as the adjacent listed Westerfield House. It forms a part of the historic curtilage and only became separated from the main house in 1920 when the property was sold in lots. Though much altered, it still has historic significance as a part of the original layout of country residence and 'home farm'. The arrangement of its farmyards can still be understood and early maps suggest that they were augmented by glasshouses across the road in the northern part of Area (B).

3.37 In more recent times farm buildings have been converted to commercial uses and additional buildings in a 'barn-like' form and design have been added, creating the impression of an enlarged farmyard. The former relationship between country residence and 'home farm' has been replaced with these commercial uses and the inter-relationship is no longer present. However, the historic relationship and visual connection is significant and can still be understood.

- 3.38 The main farmhouse is probably that referred to as ‘the farm bailiff’s house’ in sales particulars. It sits gable end to the road to the north of the former stable yard to Westerfield House. It is built of a similar red brick to the main house with a single storey lean-to on its northern side and its rear section includes a later extension which has been rendered. The windows are twentieth century replacements and the roof is pantiled.



Fig. 29 Westerfield Farmhouse



Fig. 30 Westerfield Farmyard



Fig. 31 Modern 'barn-like' buildings



Fig. 32 Westerfield House &amp; Farm

## 2. Water Tower

- 3.39 Situated on the west side of Tuddenham Lane between Lacey’s Farm and Villa Farm, is the water tower ‘complex’ with a small group of modern houses opposite, all within Tuddenham parish in East Suffolk. The first water tower was built after 1905, appearing on the 1926 map. Rather like Allen’s and Lacey’s farmsteads, this is a distinct, albeit more recent group of buildings at a right angle bend in the road with Villa Farm further south-east, which forms yet another group sited at the lane’s junction with Seven Cottages Lane.
- 3.40 The old water tower still stands, unused in a compound which contains its larger, later replacement. Beyond the wire compound is a modern house. The tower is visible from the lane, but does not form a landmark. It retains its tank on top of the tower structure

- 3.41 Though perhaps not of great architectural significance, it has historic value. East Anglia has a rich heritage of water towers, varying from the ornate to champagne glass shaped concrete structures of more recent times. A number of the ornate towers are designated listed buildings, but the more utilitarian designs are not so favoured, despite their important cultural and historical significance to industrial archaeology. Once they became redundant, many were demolished. According to Historic England, “the water industry in England then was of the greatest international importance...many of the solutions adopted in Europe and North America were first devised in English towns”<sup>15</sup>. Historic England recognises the significance of water towers and The British Water Tower Appreciation Society exists to increase awareness of their importance.



Fig. 33 The Old Water Tower

- 3.42 The tower was replaced in the second half of the twentieth century by a taller, modern structure, which is more of a landmark. It is visible across site (A) from the track leading from Allen’s House and looking east from Humber Doucy Lane.



Fig.34 The ‘New’ Tower rom the track to Allen’s House



Fig.35 From Humber Doucy Lane

<sup>15</sup> Bocking, N op. cit.

### 3. Villa Farmhouse

- 3.43 Villa Farmhouse was built as a fashionable replacement for the then outdated sixteenth century open hall house, the remains of which are sited to the rear. The replacement is a three bay buff brick building with a projecting porch and six over six pane, hung sash windows without horns. It has a hipped slate roof with overhanging cornice and brick chimney stacks.



Fig.36 Villa Farmhouse

- 3.44 Although not a listed building, it is certainly of local interest and has significance in its relationship with the remains of the sixteenth century listed building. It is separated from its farm buildings and pond by a red brick boundary wall of an earlier date.
- 3.45 It is a significant component of the site's history and has social and historic value as an example of changes in farm fashion and prosperity. The property lies within the parish of Rushmere St Andrew in East Suffolk.

### 4. Seven Cottages

- 3.46 The seven cottages on Seven Cottages Lane appear on the 1882 map and possibly date from the mid-nineteenth century. In more recent times an additional cottage has been added on the southern end of the terrace. They form an isolated terrace of artisan cottages behind a white painted paling fence, at a bend in the narrow road which takes its name from them. The scene is essentially rural, surprisingly close to the urban edge of Ipswich. Although altered and with recent housing to the rear, their historic aspect with views across fields to the north remains and the lane forms part of the network of narrow country roads and paths.

- 3.47 They have some historic significance within Rushmere parish in East Suffolk and formed a part of the wider setting of the parish church (a grade II\* listed building). Development to the rear has altered the visual connection, but they remain as a reminder of the former rural nature of the parish before part of it was taken into the Borough and Rushmere Hall estate developed for housing.



Fig.36 Seven Cottages from the south



## 4.0 Heritage Impact Assessment

4.1 This heritage impact assessment can only view the proposed allocation in broad terms, explaining the areas and views which are sensitive and the effect of development on the significance of heritage assets and their setting. The full impact of any development on the setting of heritage assets and the wider historic landscape can only be properly assessed when formal planning applications are made. The intention at this stage is to inform the master planning process which will lead eventually to the planning applications.

4.2 The foregoing section on 'Heritage Assets' has identified the importance of existing landscape and views to the setting and significance of the heritage assets. The historical context demonstrates the urban expansion of Ipswich, particularly during the early twentieth century, with development taking-up most of the estate of Rushmere Hall, creating a hard urban edge to the town on the west side of Humber Doucy Lane. The former tree-lined lane has been widened to take more traffic leaving views to the east across arable fields. The lane formerly formed a part of a historic road network, which linked it via paths and tracks eastwards to Tuddenham Lane and further east to the valley of the River Fynn.

4.3 The *Landscape Fringes of Ipswich* report (vol 1) concluded that the lane between Tuddenham Road in the north-west and Villa Farm in the south-east,

*'although elevated, is relatively flat and enclosed by mature hedgerows. It is not widely visible from the surrounding landscape and lies close to the existing urban edge. This area is less sensitive to residential and commercial development where it is associated with new woodland planting. Care will be needed to ensure rural countryside beyond the Ipswich administrative area continues to function as a 'green rim' to the town* (my underlining).

4.4 The constraints imposed by the setting of heritage assets and the historic settlement pattern, qualify that statement. This general area, primarily within the boundary of East Suffolk, containing the historic landscape and farmsteads south of the Fynn valley, forms a highly sensitive landscape. Any development, including public open space and leisure facilities which create further traffic on the narrow lanes, will inevitably detract and highway 'improvements' could be especially harmful to this sensitive area and consequently to the significance the of the historic farmsteads for which this setting forms a significant component.

4.5 The following sketches summarise the potential impact. Taking each assessment area in turn, they show the position of the heritage assets, views which make a positive contribution to their setting and areas of sensitivity which, if developed could be harmful to their setting and significance. Whilst these areas are sensitive, they may accommodate secondary uses (e.g. sports pitches, early years setting, SANGs, green rim trail). These are explained in the text. Where appropriate, areas of opportunity for larger scale residential development are shown and also described.

## Area (A)

- 4.6 This area is situated between the railway line to the north and the Rugby Club ground (and area (C)) to the south. Five heritage assets are located outside the site on the west and east sides. Westerfield House has undergone much change during the past 100 years and its isolation has been compromised as a result. But it can still be experienced and understood as a country house with its adjoining farm.

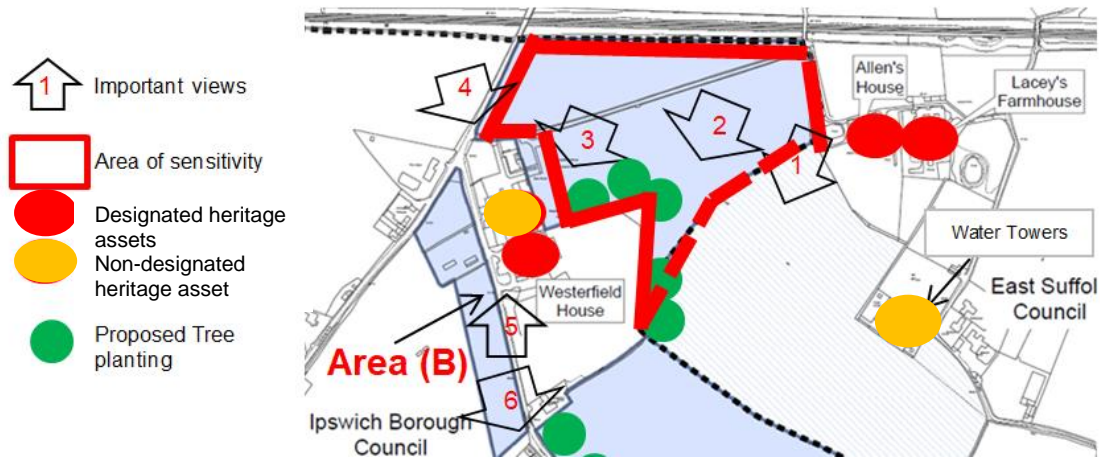


Fig. 37 Area (A): Constraints

## Views

- 4.7 Distant views from the track to Allen's House, across large fields, provide glimpses of the farmstead and its individual buildings gradually become apparent as it is approached. View (1) shows the distant view and (2) the distinct group of buildings from the bridleway.



Fig.38 View (1) from Allen's House to Westerfield House (arrowed)



Fig.39 View (2) from the track to Allen's House

- 4.8 The setting remains that of a farm group, until closer still, the individual buildings can be seen together with the former hotel ‘chalet’ accommodation to the rear of the main house (view (3)). The entrance to the farmyard, which is the main entrance to the commercial units, retains some aspects of the farmyard setting (view (4)).



Fig.40 View (3) The edge of Westerfield Farm with hotel chalets visible



Fig.41 View (4) ‘Farmyard’ entrance

- 4.9 The area to the north-east of Westerfield House and Farm is essentially rural in character. It is the characteristic which still gives the impression of an isolated farmstead – an important component of its setting which contributes to its overall significance. These fields also contribute to the stronger rural setting of Allen’s House and Lacey’s Farm, which lie immediately to the east of the area boundary.
- 4.10 Westerfield House still presents its principal façade to Humber Doucy Lane and the uncluttered view of it from the south is visually significant (view 5). It emphasises the sense of isolation and remoteness from the edge of Ipswich. Although Humber Doucy Lane has also changed over time and been widened, it is still a relatively narrow ‘hedge-lined road which contributes to the sense of separation between Westerfield House and the urban edge (view (6)). Indeed views from Westerfield House south along the lane do not include the urban edge, which only suddenly becomes apparent at the bend in the road, near no. 445 Humber Doucy Lane (a former pair of early twentieth century cottages, now a single dwelling).



Fig.42 View (5) Looking north to Westerfield House (arrowed)



Fig.43 View (6) South along Humber Doucy Lane The urban edge not visible

### Area of Sensitivity

- 4.11 The whole of area (A), to the north –east and east of Westerfield House, around Allen’s House and Lacey’s Farm is sensitive. It forms a part of the countryside setting around these heritage assets and leads into the historic network of lanes and footpaths which are important to their setting and significance. A strong hedge line marks the eastern edge along Tuddenham Lane and the railway line marks its northern extent. The boundary around Westerfield House and Farm is also fairly clearly defined, although the removal of trees in the mid-twentieth century has left it more exposed. The south-western edge, however, is difficult to define and a dotted line is shown on the drawing (fig.37) above, simply following the borough boundary. There is no clear physical feature here to properly define the edge of the area of sensitivity.
- 4.12 Development within this sensitive area for housing is likely to be harmful to the setting of the heritage assets, and their setting is a highly important component of their significance. Whilst in terms of the NPPF, the level of harm is not substantial, the level of ‘less than substantial harm’ is nonetheless high. The three listed farmhouses are experienced as a part of a wider rural setting and this rural setting forms a visually significant ‘green rim’ to Ipswich.
- 4.13 Though the area is sensitive to development, it is possible that it could accommodate some secondary recreational uses, limiting the level of harm, though it is important to ensure that any access further eastward towards Tuddenham Lane is restricted to footpaths and cycle paths without vehicular access. The dotted boundary marking the south-western edge of the area indicates the need for soft boundaries and landscape buffering to avoid the intrusion of a hard urban edge and perhaps offers an opportunity to accommodate some of the secondary uses for which the site is allocated (e.g. green rim trail).

## Area (B)

- 4.14 This narrow strip of land is located on the opposite side of the road from Westerfield House and Farm. It can be divided into two halves. The northern section comprises a pair of overgrown paddocks which old maps show had glasshouses on part of them, possibly associated with Westerfield Farm across the road.

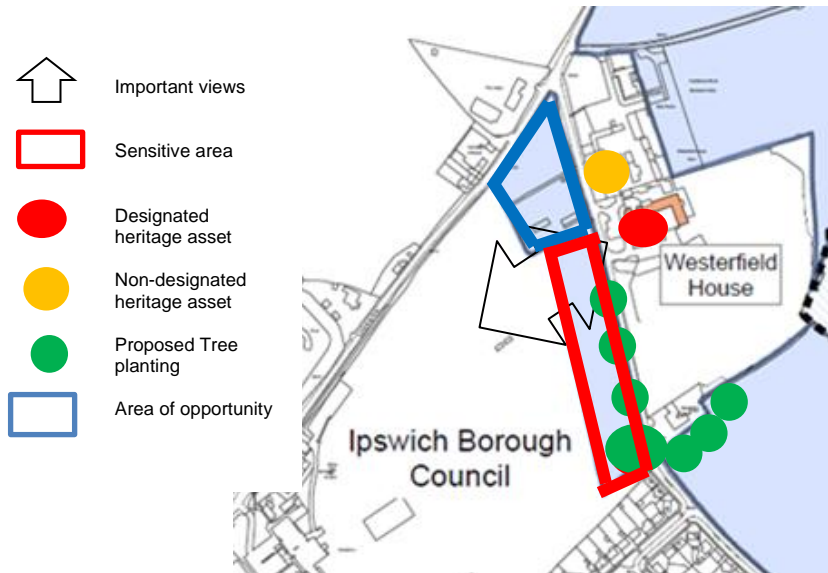


Fig. 44 Area (B): Constraints & Opportunities

### Area of Opportunity

- 4.15 The northern section, though small, offers some opportunity perhaps including highway improvement at the Tuddenham Road junction. There is precedent for buildings on this part of the site and a low-key development could add to the existing farm cluster and the group of buildings, housing a clinic, at the junction with Tuddenham Road, without causing undue harm to the setting.



Fig.45 Juliet John Clinic, Tuddenham Road

## Views & Area of Sensitivity

- 4.16 The southern section of Area (B) is a rectangular field with a row of trees to the west. The northern end of the area sits directly opposite the principal façade of Westerfield House and provides views to and from the heritage assets. These are significant views and the house built for the Colletts in the eighteenth century would have provided views westwards across farmland in this direction. The view is important to the setting.



Fig.46 View across Area (B) from Westerfield House

- 4.17 Area (B) extends southwards along Humber Doucy Lane to the bend in the road which forms the urban edge. The bend in the road is important, defining the edge of the town clearly separate from the countryside northwards. The view to the north shows the isolated location of Westerfield House (see fig.42), which forms part of its setting. The discreet nature of the urban edge here is a positive feature and development of this southern section of Area (B) would harm it. Development of this narrow strip would almost amount to a ribbon development, removing the discreet urban edge and compromising the distant views towards Westerfield House.



Fig.47 The urban edge at the bend in the road (Area (B) arrowed)



Fig.48 Area (B) looking north

## Area (C)

4.18 This discreet arrival into the town, described above, is partly the result of only one side of the road being developed. To the east are arable fields and as the *Landscape Fringes of Ipswich* notes, they provide an abrupt contrast to the urban edge and feel a part of the wider rural landscape. The edge here is marked by the start of the rows of prefabs with the remains of the mature trees which once lined the lane (fig.50). Across the road, Area (C) is hidden by the roadside hedge with glimpses across the field to the water towers on Tuddenham Lane (see fig. 34). The field is slightly elevated above the level of the prefabs.



Fig. 49 Area (C): Constraints & Opportunities



Fig.50. Looking north with prefabs and mature trees

### Area of Opportunity

4.19 This site, on the east side of Humber Doucy Road, opposite existing housing, is an area of opportunity. It lies to the south-east of the bend in Humber Doucy Lane which marks the current urban edge. Whilst a strong hedge line forms the distant view in the east across the site, its extent in that direction is difficult to define. The object would be to soften the edge of any development in that direction and so a staggered boundary may be more apt, incorporating tree planting.

- 4.20 This area if developed for housing would cause least harm to the setting of heritage assets. It is, however, raised above the level of the prefabs on the west side of Humber Doucy Lane, which could affect amenity of these dwellings depending on the design and positioning of new housing. Single storey buildings, perhaps set back from the road behind a wide verge, may be appropriate and the opportunity presents itself to reinstate the historic setting of a tree-lined lane: the *ombre doucy*, along Humber Doucy Lane.



Fig.51 Area of opportunity, east side of Humber Doucy Lane

- 4.21 Tree planting should form an important component of any landscaping proposal, creating a leafy suburb to the town with housing of varying densities. Standard estate development should be avoided and housing of mixed density in the form of clusters of houses, reflecting the varied housing design in the vicinity of Humber Doucy Lane. A limited palette of materials would seem appropriate; clay tiles, red and grey brick, render etc., but design should not be prescriptive to the point of discouraging contemporary designs of quality. Paragraph 131 of the NPPF urges great weight be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings. The reinstatement of tree cover on the eastern side of Westerfield House would help to assimilate the proposed care home, whilst enhancing an historic setting which was damaged in the 1920s with the provision of sports pitches for the private school.



## Area (D)

- 4.22 Area (D) follows the north side of Humber Doucy Lane from Ipswich Rugby Club ground to Seven Cottages Lane, all within the borough boundary. The urban edge is on the south side of Humber Doucy Lane and comprises a row of bungalows, followed westwards by a row of two storey houses.



Fig.52 Humber Doucy Lane with Area (C) on right

- 4.23 Three heritage assets are within a short distance of the site; Villa Farmhouse and its store lie to the north, separated from Area (C) by a field which runs along Seven Cottages Lane to its T-junction with Tuddenham and Lamberts Lanes. Seven Cottages is a short terrace (now of eight cottages) on the eastern edge of the site.

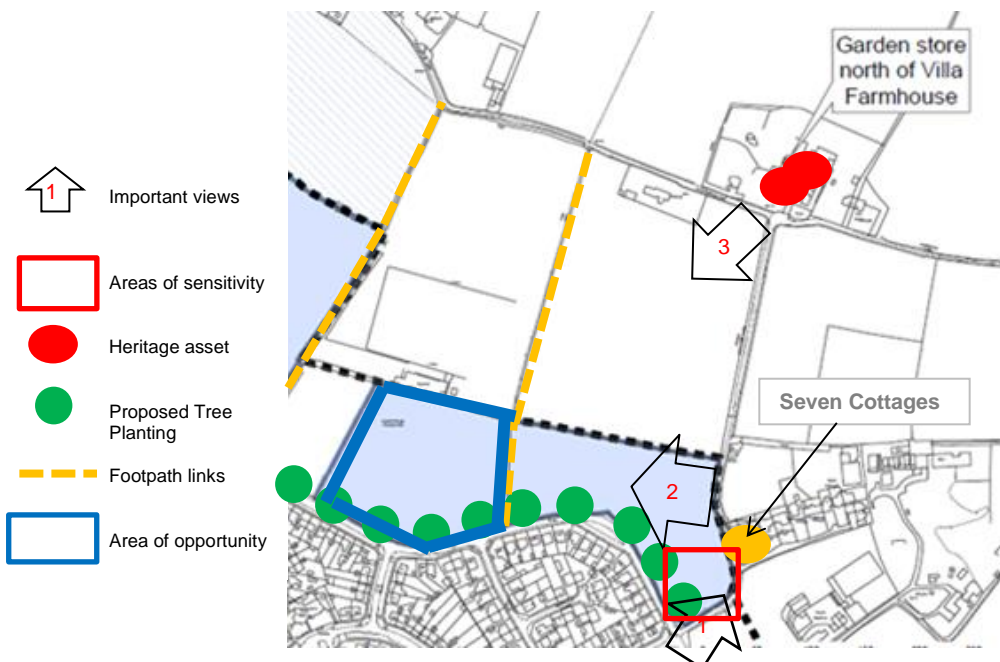


Fig.53 Area (C): Constraints & Opportunities

### Area of Sensitivity

- 4.24 The eastern edge of the site is sensitive. The junction of Seven Cottages Lane with Humber Doucy Lane marks the urban edge and the gate way to the narrow, tree lined lanes which form a part of the historic settlement pattern and make an important contribution to the setting of sixteenth century farmsteads of which Villa Farm is one.
- 4.25 Immediately entering Seven Cottages Lane the view ahead (view 1) is of the cottages at a bend in the road. This is a significant view. Urban Ipswich is behind and the countryside is in front. The lane and its connecting paths form a popular informal recreation facility for walkers, joggers and cyclists.



Fig.54 View (1) Seven Cottages Lane looking north



Fig.55 Bungalows on the edge of the site viewed from Seven Cottages

- 4.26 Area (D) is bounded on its north side by a mature hedgerow with trees with views westwards to the rugby pitches (view (2)). This view contributes to the open countryside setting and the hedge, which forms the borough boundary, has an unauthorised but well used footpath connecting the lane to the public footpath running alongside the rugby ground from Humber Doucy Lane to Tuddenham Lane.



Fig.56 Area (C) looking west from Seven Cottages Lane



Fig.57 Footpath along hedge

- 4.27 The visual importance of the hedgerow is emphasised by the view south from Villa Farm (view (3)). Housing on Humber Doucy Lane is not visible. The view is of countryside, part of the green rim to Ipswich.



Fig.58 View from Villa Farm south to borough boundary hedge

- 4.28 This area north of the borough boundary hedge and extending eastwards towards Rushmere St Andrew and west wards along Tuddenham Lane towards Lacey's Farm, within East Suffolk, is highly sensitive. Not only does it form a part of the historic setting of the heritage assets and part of a historic settlement pattern, it also serves as an important connection to the countryside on the edge of town. Development of Area (D) would encroach on this valuable resource and diminish its rural qualities.

#### Area of Opportunity

- 4.29 Opportunity for modest housing development exists close to the rugby ground at the western end of the site. Housing, perhaps taking the form of a 'green' with cottages in the form of 'Seven Cottages' rendered with pantile roofs might be appropriate in this location, but the remainder of Area (D) forms a part of the informal recreation facility and any development would be harmful, with the necessary highway improvements. Access to any development should be from Humber Doucy Lane.
- 4.30 This eastern edge of the area would be better respected as a countryside facility and the informal path along the borough boundary hedge used to properly connect with the footpaths running parallel to Seven Cottages Lane in the vicinity of the rugby ground. There is an opportunity is to strengthen the landscape and soften the urban edge.

## 5.0 Conclusion

- 5.1 The National Planning Policy Framework (2019) identifies the protection and enhancement of the historic environment as an important element of sustainable development and also states that the significance of heritage assets can be harmed or lost by development in their setting. Paragraph 200 states that proposals which preserve those elements of the setting that make a positive contribution to, or better reveal the significance of the heritage assets should be treated favourably.
- 5.2 Paragraph 192 of the NPPF requires local planning authorities, in determining planning applications, to take account of “the desirability of sustaining and enhancing the significance of heritage assets.’ Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset from development within its setting should require clear and convincing justification’ and paragraph 193 advises that when considering the impact on the significance of designated heritage assets, great weight should be given to their conservation.
- 5.3 Paragraph 197 states that “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 affect directly or indirectly 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”.
- 5.4 Paragraph 192 urges local planning authorities to take account of the positive contribution that the conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.
- 5.5 It is clear that the proposed development of parts of the allocated land off Humber Doucy Lane could be harmful to the setting of designated and non-designated heritage assets. Development of the areas identified as ‘sensitive’ would cause significant levels of harm not only to the setting of heritage assets but also to the wider countryside setting. Whilst this level of harm might be, in terms of the NPPF, ‘less than substantial’, the level of less than substantial harm would still be high.
- 5.6 Where development opportunities have been identified, particularly in area (C), development of appropriate design could proceed with far less harm caused. Indeed the level of harm to heritage assets would not exist or be minimal.
- 5.7 Although areas (A), (B) and part of (D) are particularly sensitive, secondary recreational uses may be possible without causing significant harm, provided access to these uses is either from within the development in area (D) or from the main roads. Vehicular access to Tuddenham and Seven Cottages Lane and the bridleway to Allen’s House would be harmful.
- 5.8 Whilst some level of harm could be mitigated, the sensitive sites would remain vulnerable despite mitigation measures. Views can be protected, but they are only a part of the overall setting of the heritage assets and their relative countryside setting requires protection. Mitigation will result from the implementation of a landscaping scheme and to that end, it is important to ensure that ‘structural landscaping,

particularly tree and hedge planting takes place at the earliest opportunity to allow it to establish before any development takes place.