



Historic England

Examination of East Cambridgeshire Local Plan

Matter 16/Issue 1/Kennett

Historic England, Hearing Statement

September 2018

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

Historic England Hearing Statement

Introduction

- 1.1 This statement addresses the Inspector's questions with regards Matter 16, Issue 1, Kennett of the Local Plan.
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages (dated 19th December 2017, 15th May 2017, 22nd February 2017 and 24th March 2016) of the Local Plan and our Stage 1 Hearing Statement.
- 1.3 Historic England has made comments on a number of other medium village site allocations in the East Cambridgeshire Local Plan. We do not have any additional comments to make and will be relying on our previous representations.

Matters and Issues for East Cambridgeshire Local Plan

Issues

Matter 16: Proposed site allocations- Medium Villages

Relevant Policies- LP3, site allocations and relevant development management policies

Issue 1: Whether the proposed site allocations, excluding Local Green Spaces, for the defined Medium Villages of Ashley, Burrough Green/Burrough End, Cheveley, Dullingham, Kennett, Little Thetford, Lode with Long Meadow, Mepal, Newmarket Fringe, Stetchworth, Swaffham Bulbeck, Swaffham Prior, Wilburton are justified, based on up-to-date evidence, effective, viable, deliverable and consistent with national policy?

62. Taking each of the following proposed site allocations individually:

KEN.M1 Land to the West of Station Road

h) What are the potential adverse impacts of developing the sites, including to heritage assets? How could they be mitigated?

n) Is the boundary of the site appropriate? Is there any justification for amending the boundary?

o) Are the detailed policy requirements clear and unambiguous, effective, justified and consistent with national policy?

Historic England response

The Site and Surroundings – Heritage Assets

2.1 The KEN.M1 mixed use allocation to the West of Station Road, Kennett is allocated for around 500 dwellings, employment provision, primary school and local centre. The site allocation contains a scheduled monument, Howe Hill bowl barrow which survives as a substantial earthwork. There are a number of other barrows in the surrounding area; The Rookery, Hilly Plantation bowl barrow, and four bowl barrows north of the A11/A14 junction, all of which are part of the Chippenham bowl barrow cemetery. In addition we highlight the grade II listed School House and School in Kennett opposite the allocation site.

- 2.2 Howe Hill Barrow is a Bronze Age bowl barrow situated in a prominent position on high ground to the west of the village of Kennet, on the south side of Dane Hill Road approximately 50m west of its junction with Station Road. The barrow mound is slightly oval in plan, measuring 31m north to south by 28m east to west. It stands about 3m above the surrounding ground surface, with steep slopes surrounding the northern end of the mound and a less severe slope descending to the south from a level area on the summit measuring 6m across. There is no visible indication of a surrounding ditch. The barrow, which is apparently unexcavated, forms part of a dispersed group of similar monuments occupying the high ground to the north east of Newmarket; the nearest of these, which is scheduled separately, lies approximately 1.5km to the south west. This group in turn forms part of a wider distribution of barrows which extends to the south west across the chalk escarpment towards Royston, Herts.
- 2.3 Bowl barrows, the most numerous form of round barrow, are funerary monuments dating from the Late Neolithic period to the Late Bronze Age, with most examples belonging to the period 2400-1500 BC. They were constructed as earthen or rubble mounds, sometimes ditched, which covered single or multiple burials. They occur either in isolation or grouped as cemeteries and often acted as a focus for burials in later periods. Often superficially similar, although differing widely in size, they exhibit regional variations in form and a diversity of burial practices. There are over 10,000 surviving bowl barrows recorded nationally (many more have already been destroyed), occurring across most of lowland Britain. Often occupying prominent locations, they are a major historic element in the modern landscape and their considerable variation of form and longevity as a monument type provide important information on the diversity of beliefs and social organisations amongst early prehistoric communities. They are particularly representative of their period and a substantial proportion of surviving examples are considered worthy of protection.
- 2.4 The Howe Hill bowl barrow is very well preserved, in marked contrast to the majority of barrows in the region which are generally only visible on aerial photographs. The mound stands close to its original height, and there is no evidence that it has ever been excavated. Funerary remains surviving undisturbed within and below the mound will provide valuable insights into early burial practices and the beliefs of the community which built the monument. The former ground surface, buried beneath the mound, will retain important evidence for the appearance of the landscape at the time it was constructed.

- 2.5 The association between the Howe Hill barrow and the wider group of similar monuments located to the west is particularly significant. Comparison between these sites will provide important information concerning the variation and development of early burial practices and the distribution of early settlement.
- 2.6 The grade II listed school and school house were built in 1865 by Rev. W Godfrey, Lord of the Manor and Rector in knapped flint with yellow gault brick quoins and red brick banding and decoration to window arches. The roofs are in graded slate.

What are the potential adverse impacts of developing the sites, including to heritage assets?

- 2.7 Historic England continues to have concerns regarding the allocation of this site. Policy Kennett 4 and the Policies Map Inset Map 19 do not accord with the National Planning Policy Framework and are not justified and effective. We have consistently raised our concerns during the last two years in our previous submissions (dated 19th December 2017, 15th May 2017, 22nd February 2017 and 24th March 2016) and below.
- 2.8 We consider that the development has the potential to cause a level of harm to the significance of these assets owing to the wide ranging and irrevocable change to their surrounding landscape context and setting. Essentially, development of the proposed site allocation would represent considerable change to the present landscape context of these heritage assets and could have potential adverse impacts upon the scheduled monument (Howe Hill Barrow) and its setting as well as the settings of the listed buildings (the grade II school house and grade II* church. Further advice on settings of heritage assets can be found in the Historic England Good Practice Advice in Planning 3 – the setting of heritage assets: (Dec 2017) <https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets.pdf/>
- 2.9 We note bullet point I of Policy Kennett 4 seeks to address the matter of the scheduled monument. However, we are concerned that this does not provide sufficient protection to the heritage asset. The buffer zone for the scheduled monument shown on the policies map inset 19 is very small; too small to provide sufficient protection for the setting of the monument. The policy currently makes no reference to the need to preserve the setting of the listed building.
- 2.10 Paragraph 35b of the NPPF refers to the need for a proportionate evidence base. We consider that the allocation is not justified and there is insufficient evidence to properly assess the impact on the historic environment. That evidence which does exist points to the unsuitability of the site as an allocation.

- 2.11 In respect of the site at Kennett, the SA assesses the allocation as having the *'potential for a significant adverse impact'*. The commentary identifies that *'there are heritage assets on site that would need to mitigate against'*. (This presumably means that there are *impacts* on heritage assets on site that would need to be mitigated against rather than that the asset itself would require mitigation). However, the SA does not specify that it is a scheduled monument on site, nor does it reference the nearby listed building. We note that the policy includes a criterion (bullet point I) that seeks to address the scheduled monument. In addition, the proposals map includes a symbol identifying the scheduled monument and a small buffer zone around the monument. This is then reflected in the SA which states that the policy *'provides requirements to mitigate against potential effects on a range of designated sites. The policy therefore mitigates against identified possible impacts of the site'*.
- 2.12 Historic England would highlight paragraph 32 of the NPPF which states that 'Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed.' In the first instance adverse impacts should be avoided. Only when there are no reasonable alternatives should mitigation be considered.
- 2.13 Having reviewed the Site Assessment Evidence Report for this site, Historic England considers that the allocation is based on insufficient evidence to properly assess the impact on the historic environment. We are also concerned that the Plan does not sufficiently mitigate the impact. As we have repeatedly stated, at the very least the buffer around the scheduled monument should be larger, providing a cone or wide green corridor connecting Howe Hill Barrow with the barrows to the south. This, in turn, may affect the capacity of the site. Finally, no mention is made of the nearby listed building in the policy. This policy omission should be rectified.
- 2.14 The allocation is not consistent with national policy and is contrary to the policies in the Framework, in particular paragraphs 193 and 194. Paragraph 193 states that great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Paragraphs 190 and 194 make it clear that significance can be harmed by development within the setting of a heritage asset. We consider that development of this allocation would result in harm to the setting of the scheduled monument and this should be avoided in the first instance. We therefore object to the principle of the allocation.

How could they be mitigated?

- 2.15 Notwithstanding our concerns outlined above, should you decide to maintain this allocation, in order to make the Plan sound, we suggest that either the allocation site is reduced in size, removing the monument and its setting from the allocation (further consideration of this approach is given under the next sub-question), or the buffer zone is increased in size to provide greater protection to the heritage asset.
- 2.16 Ideally the extent of the buffer zone would be informed by a heritage impact assessment through the plan preparation process. However, given the stage of the Local Plan, Historic England suggests that the pragmatic approach would be to enlarge the buffer zone on the policies map, providing a wide buffer around the monument itself and a wide open corridor to the south connecting the barrow to the open rural land and barrows beyond. A heritage impact assessment would then be required at master-planning and application stage to refine the appropriate extent of this buffer and to ensure sufficient protection of this heritage asset. This requirement should be included in the Plan as paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal. Our suggested wording for Policy KEN.1 is included in paragraph 2.21 below.
- 2.17 Particular consideration should be undertaken to ensure that any proposals for the site are designed to minimise any adverse impact on the setting of the barrow. Measures to achieve this might include the incorporation of the monument into public open space, and the securing of appropriate management and interpretation.
- 2.18 In discussions with the developer, we have previously advised that the buffer zone around the scheduled monument should be larger in order to afford the scheduled monument greater protection. We advised that their proposed green corridor should be widened substantially in order to preserve the barrow's setting. This would provide a visual link between the barrow and the barrows beyond the site. We suggested that this could be achieved by locating the village green and public open space to the north- west corner of the allocation so that the barrow could form part of the communal open space with a greater concentration of housing towards the eastern side of the allocation in proximity to the station. Even if this were not possible, we would still expect to see a substantial widening of the buffer and green corridor to better protect the setting of the scheduled monument.

Is the boundary of the site appropriate? Is there any justification for amending the boundary?

- 2.19 One possible way forward to protect the scheduled monument could be to significantly reduce the size of the allocation to remove the monument and its

setting from the allocation. This could reduce the size of the allocation by up to a half.

- 2.20 However, we recognise that there can be some possible enhancements to the monument and its setting through incorporating it into the allocation as a whole, albeit with a suitable buffer and appropriate enhancements to the scheduled monument. To that end, if it is considered appropriate to maintain the allocation, it may be better to include the monument within the boundary of the allocation but to enlarge the buffer shown around the monument on Inset Map 19.

Are the detailed policy requirements clear and unambiguous, effective, justified and consistent with national policy?

- 2.21 As indicated above, Historic England has concerns regarding the current policy requirements for this site, both in policy KEN.1 and also the Policies map. They are not clear and unambiguous, nor are they effective, justified or consistent with national policy. In order to make the Plan sound, if the allocation is maintained Historic England requests the following amendments:

a) Amendment to Policy KEN.1 criterion I

Historic England requests an amendment to the policy wording for criterion I to read:

I. Development should conserve ~~protect~~ and where appropriate enhance heritage assets and their settings including Howe Hill Barrow Scheduled Monument and the School and School House grade II listed building in accordance with the buffer zone on Policies Map Inset 19, policy LP27 and national policy. The precise extent of the buffer zone will be determined through a Heritage Impact Assessment at the master-planning/planning application stage.

b) Amendment to Policies Map Inset Map 19, Kennett

Historic England requests an amendment to the policies map to include a larger buffer to the scheduled monument. The buffer should be much larger around the monument itself and also extend to the south to provide a broad connection between the barrow and the wider rural landscape and other barrows to the south/south west.

2.22 In summary,

- Development of the allocation site has the potential to harm the setting of the scheduled monument, and also the setting of the listed building.
- In the first instance harm should be avoided and an alternative site sought.
- However, if this is not possible and the allocation is maintained, mitigation may be pursued.
- The policies map Inset 19 shows a very small buffer around the scheduled monument. If the allocation is carried forward, this buffer needs to be substantially increased, as outlined above, to afford greater protection to the scheduled monument and its setting.
- Criterion I of policy Kennett 4 should be amended to make reference to the need for an HIA to inform the extent of the buffer zone.
- Criterion I of policy Kennett 4 should also include reference to the need to preserve the setting of the listed building.