



# HERITAGE IMPACT ASSESSMENT ON BEHALF OF FARNHAM ENVIRONMENT RESIDENTS AND NEIGHBOURS (FERN)

## **Farnham Two Villages Bypass**

May 2021



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# 1 Qualifications and Scope of Work

1.1 This heritage impact assessment has been prepared by Charmain Hawkins who is a Chartered Town Planner and Full Member of the Institute of Historic Building Conservation; with a Bachelor of Arts Degree in Geography (Birmingham University); Masters in Town Planning (Manchester University) and Diploma in Building Conservation (RICS) (College of Estate Management University of Reading).

1.2 Brighter Planning Ltd is a specialist independent planning and heritage consultancy which operates largely in the London and East Anglia region. The company has undertaken work for both private and public sector clients covering a wide range of building types and uses.

1.3 Brighter Planning Ltd was established in September 2018, and Mrs Hawkins is the sole Director, having previously worked as an Associate in the Heritage Team at Beacon Planning Ltd (Cambridge) for over 10 years. Prior to that employment was in the urban local authorities of Southampton and Portsmouth City Councils before moving east and gaining rural experience at Uttlesford and South Cambridgeshire District Councils.

1.4 This statement, is true and has been prepared and is given in accordance with the guidance of the professional institutions which Mrs Hawkins is a member of. The opinions expressed are her true and professional assessment.

## Scope of work

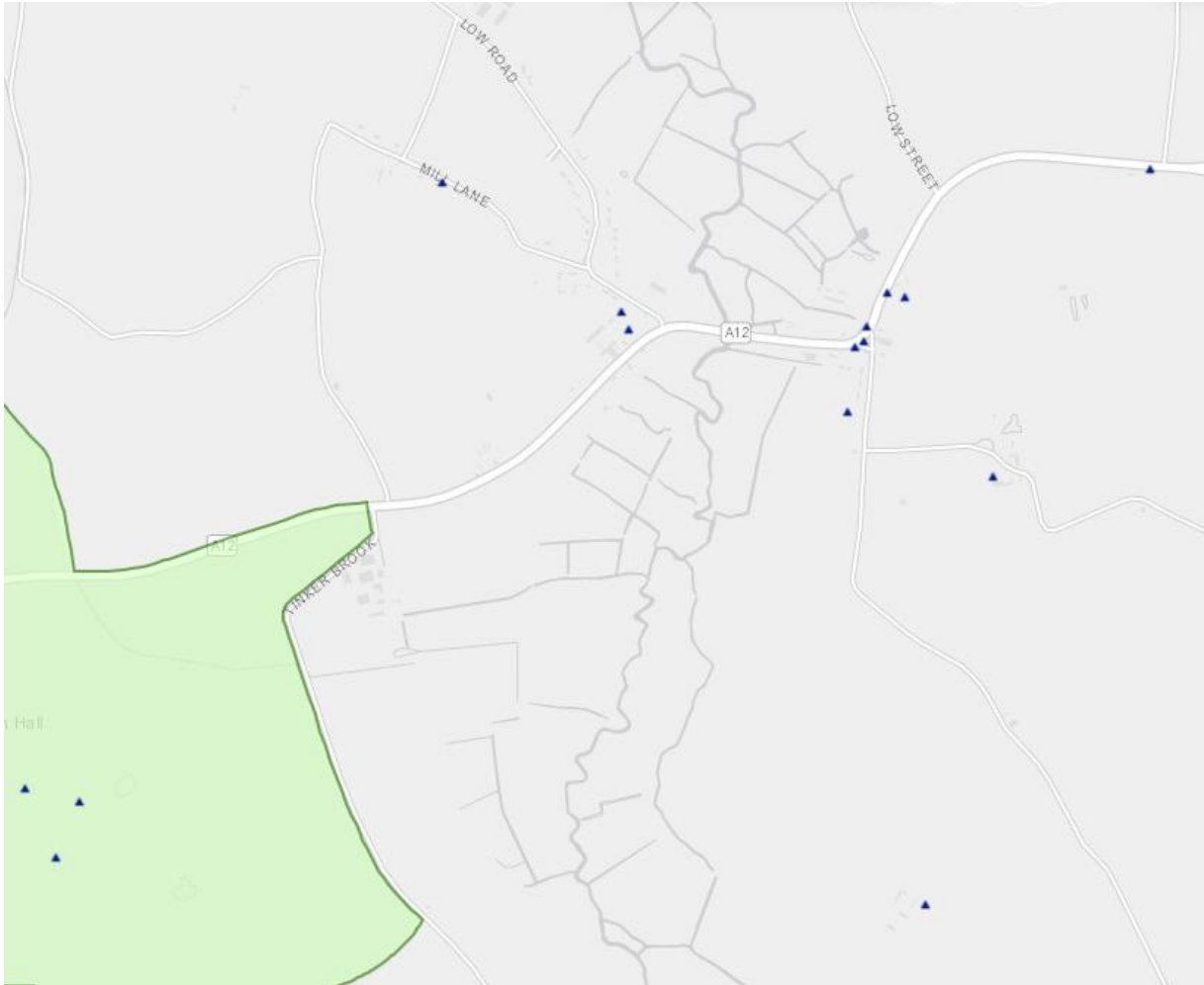
1.5 Brighter Planning Ltd were appointed to act on behalf of FERN (Farnham Environment Residents & Neighbours) in January 2021. A site inspection took place the same month and Mrs Hawkins agreed to act following this inspection. A further site visit included closer inspection of the heritage assets took place in April and May 2021 and the photos which illustrate this report date from these visits.

1.6 The scope of work is to provide an independent heritage impact assessment and having undertaken this to consider the EDF proposals and submissions and the views expressed by consultees including the Local Planning Authority.





## 2 Identified Heritage Assets



*Extract from Historic England web site*

2.1 The above map identifies the designated heritage assets located near to the application site. These are also identified more clearly on the Google Earth image in **Appendix 3**.

### Listed Buildings

2.2 The following listed buildings have been identified within the locality:



### Within Stratford St Mary (north of A12)

2.3 There are two existing buildings north of the current route of the A12 – the Church of St Andrew (Grade II\*) which was made redundant in 1992 and is now a dwelling and a row of four cottages to the south of the church (Grade II)

### Within Farnham along the current A12

2.4 There are five listed buildings within the village located adjacent to the current route of the A12.

- *The George & Dragon PH* (Grade II) – This is an C18 building, which closed as a pub in 1996.
- *The Post Office Stores* (Grade II) – The listing dates this to the early C19 and is no longer a shop and has unoccupied for some time.
- *Turret Cottage* to the northern side of the A12 (Grade II) – This is dated to the early C19.
- *Elm Tree cottage* (Grade II) – A house dating from the late C16 or C17.
- *Elm Tree farm* (Grade II) – Dates from the C16/C17.



Mid C20 view of village along A12 showing the pub and old stores

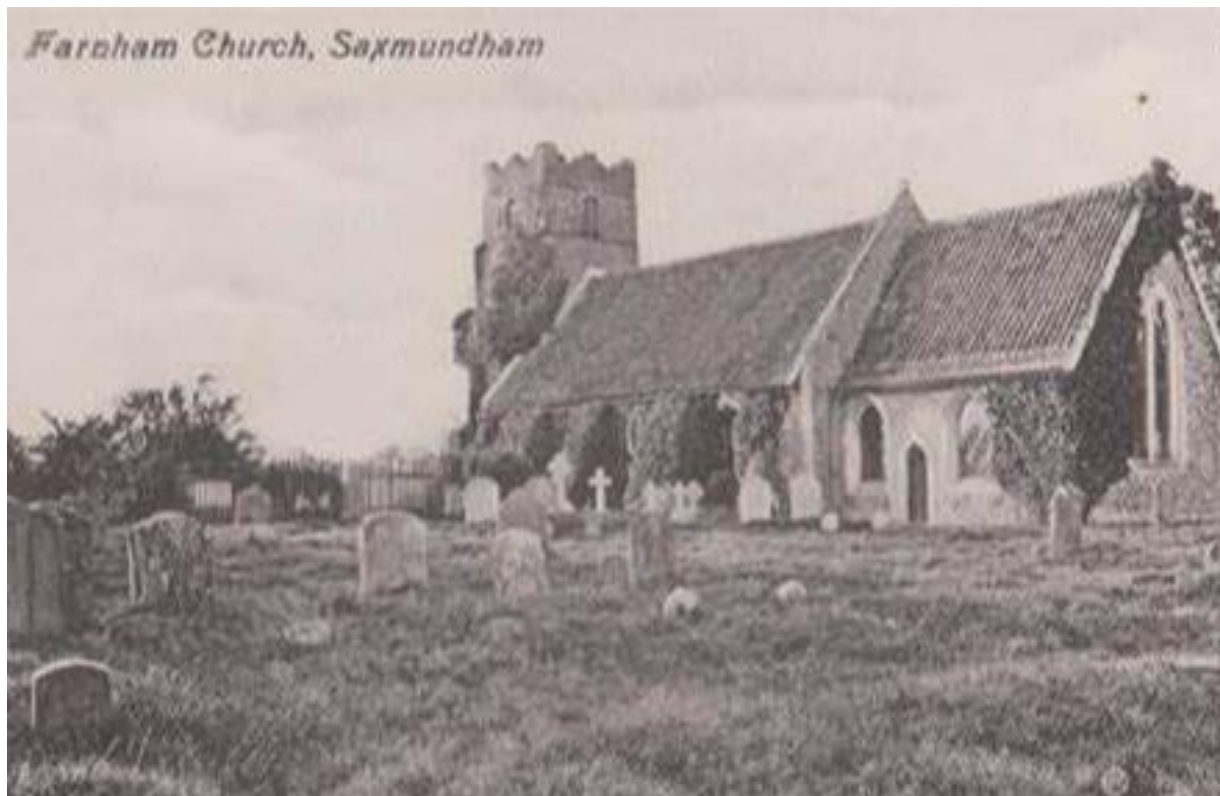


## Within the locality of the bypass route considered by the terms of reference for this report

2.5 The following listed buildings are identified as potentially being affected by the bypass route given that they are located south of the present A12:

- **St Mary's Church Farnham** (Grade II\*) – This is not recorded in the Domesday survey but does contain the remains of Norman windows and C14 fabric to chancel and tower dating from C15 or C16. The listing states it has Grade II\* status for its surviving medieval work and internal fittings. The village war memorials from WWI and WWII are within the church. The church is still in use. There are views over the river valley from the adjacent graveyard.
- **Farnham Hall (The Manor)** (Grade II) – The property has three floors of accommodation. To the exterior and interior are a number of dated features given the construction date of 1602. The 1920's extension now divided into four dwellings (The Hall) are listed by attachment and association with the Manor House. The listing description says of the C20 wing that it is 'not of special architectural interest'. The converted barns and outbuildings and walled garden area are all considered to be curtilage listed or non-designated heritage assets.
- **Hill Farmhouse** (Grade II) – The listing description dates the main range to the late C16 with a later C19 wing added.
- **Rose Hill House**, Friday Street (Grade II) – Red brick house c.1819 with older C18 house to rear. Outbuildings at Rosehill House as identified in the HERS (FNM 017).





2.6 In addition there are the major historic parks of Little Glemham Park and Benhall Lodge Park near to each end of the proposed bypass. The park at Glemham is recorded in the mid C16 as a deer park and in the C18 was landscaped following design by Humphry Repton. At the time the rerouting of the A12 was assessed in 1994 the park was undesignated but it has subsequently been added to the Historic Parks and Gardens Register and is designated Grade II.

2.7 Benhall Lodge Park is a landscaped park dating from the C18/C19. It remains non-designated but is of local importance.

## **Conservation Area**

2.8 There is no conservation area designation covering the site or the villages of Farnham or Stratford St Mary. I consider the assets even having considered their connection with the landscape to be too dispersed to consider arguing for such a designation to be considered in this location.



## Non-designated heritage assets

2.9 The following sites have been identified as being potential non-designated heritage assets within the area south of the existing A12:

- **The Old Vicarage** – Mid C19 former Vicarage. More research is needed on this building, including trying to establish if it was a pattern book design or by a known architect. Following the Gilbert Acts of the 1770's the detailed plans had to be submitted to Queen Anne's Bounty and therefore the original plans may be possible to locate.
- **Pond Barn** – The Suffolk HERs (FNM 022) dates the group of buildings to the early C19 and were probably built as agricultural workers cottages with an adjacent courtyard of outbuildings.
- **Farnham Hall Estate** – buildings around the listed Farnham Hall included former estate workers cottages and barns (now converted to residential with total of 12 dwellings on the manor site) and Farnham Hall Farmhouse to east of site. Given the majority of the buildings on the manor site predate 1948 they must be considered to be curtilage listed to the Hall. These are considered under the Hall/Manor for the purposes of this report.
- **Mollett's Farm** – The HERs record (FNM 019) dates the farmhouse from the C17 (surviving parlour bay) with the rest of the house rebuilt after a fire (Unpublished report by Leigh Alston Suffolk CC 2011). An associated barn on the site also retains a C17 bay. The banks and ditches on the site may pre-date the Norman Conquest. In 1841 the holding was tenanted and consisted of 20 acres within the estate of Benhall Lodge.
- **Walk Farm Barn** – in existence on the 1883 map and appears to be depicted on 1783 map – there is a modern bungalow on the site but the barns adjacent to this from an external assessment would appear to be at least C19 in date.

## Suffolk Historic Environment Records (HERs)

2.10 The Suffolk HERs site provides 45 records for Farnham. In summary these show that there have been archaeological finds for the Bronze Age period onwards. Of note are:

- **Burnt House Farm** south of the proposed bypass route has been excavated for Roman remains including a bath house (1971)



- It is noted that *field-walking* was undertaken in Dec 1991 along the preferred route of the A12 (same route as proposed) where scatters of Medieval pottery were found.
- *St Mary's Church Farnham* is noted as containing reused Roman tiles in the north wall of the Nave (FNM 010). The church was founded as part of a benefaction by Sir Ralph de Glanville c,1172 and this also included the founding of the churches at Butley, Bawdsey, Capel and Benhall.
- *Foxburrow Wood and Palant's Grove* (FNM 011) and *Pond Wood* These are noted by Natural England to be ancient woodland, with Foxburrow containing earthworks.
- *Possible Battlefield site* (C12)– Battle of Farnham from accounts (dated 1753) - The invasion of England by the Earl of Boloign, circa 1173. 'The Earl of Boloign was to invade England and join Robert Blanchmains, Earl of Leicester, he brought 10,000 men over with him to favour this rebellion. Richard de Lucie took the field and fought them all in a pitched battle at Farnham in Suffolk; totally routed and destroyed them.

2.11 The exact site of the battlefield is not confirmed.



# 3 Brief History of the Locality

3.1 Farnham and Stratford St Andrew are two small settlements separated by the River Alde. They are located between the parks of Glemham Hall to the west and Benhall Lodge Park to the east. It is noted that Little Glemham park is a Historic Park and Garden dating from the C16 and containing a Grade I house and is held by Dr Tom Williamson to be one of the most important park and garden sites in Suffolk. Benhall Lodge Park by contrast dates from the C18/19 and the park is held to be of only local importance. The villages are located about 3 miles south-west of Saxmundham.

3.2 The village of Farnham is believed to get its name from Old English where it means 'Fern Homestead'. The settlement was within the Plomesgate Hundred.

3.3 The main archaeological evidence pre medieval in date found within the locality includes a scatter of prehistoric flintwork (1994 SCC) and Roman remains. It is reputed that the church is built on or near to a Roman encampment site given its strategic position on the hill with views across the surrounding area. A Roman bath house was excavated near Burnt House Farm and the river crossing point of Langham Bridge which was presumably part of a villa complex.

3.4 There is very limited published material on Farnham. The village is recorded in the Domesday Book (1086) with 18 households being noted. The church is not recorded but there is reference to two mills. The Domesday survey records the village as having been previously held by Edric of Laxfield but at the time of the survey it was held by the Norman Robert Mallet who controlled his estate from Eye castle. Mallett was one of the largest Norman landholders in Suffolk but his lands were seized in 1110 after his son plotted against Henry 1. The church was given by Ralph de Glanville to Butley Priory near Orford to provide income to this Augustinian establishment.

3.5 After the dissolution the manor came into the ownership of the Glemham family but by the C17 it had passed to Sir Dudley North. The manor is not identified as having had a deer park associated with it in the medieval period.

3.6 By 1870-72 John Maris Wilson's Imperial Gazetteer of England and Wales records there being 46 houses.

3.7 By the early C20 Farnham Hall was in ownership of Sir Newton Stabb when it was run as a small country estate in its own right. He was the Chief Manager of the Hong Kong and





Shanghai Banking Corporation (HSBC). Post WWII the estate was sold off. The Hall was extended in the 1920's when the older part became The Manor. The conversion of the C20 extension to units 2-5 took place in the 1960's.

## Map regression

3.8 The earliest map obtained for this desk top study is the 1783 Hodkinson's Map of Suffolk. The Hoskinson map is assumed to capture the area post enclosure. The map is useful in that it very clearly illustrates the topography of the area, showing the plateau area of higher land, on which the Hall and church are located.



3.9 The current road network in the area affected by the proposed bypass is identifiable from this map, including what is now regarded as a private road and public footpath from the highway near the church, through the Farnham Hall area to and through Foxburrow Wood (as was) and connecting to a north/south roadway now lost, save for parts remaining as FP 6.

*Extract of  
Hodkinson's Map*





3.10 The Suffolk Record Office hold an Estate map dated 1803 and a tithe map dated 1841 but it has not been possible to view these. The image of the 1803 map is a photo of the Estate map taken by a member of FERN.



1803 Estate Map (CRO)

3.11 The Estate Map is very similar in form to the 1883 OS map although the shape of Foxburrow Wood appears stylized on the earlier map. The Estate map denotes the main roads and footpaths in the area.

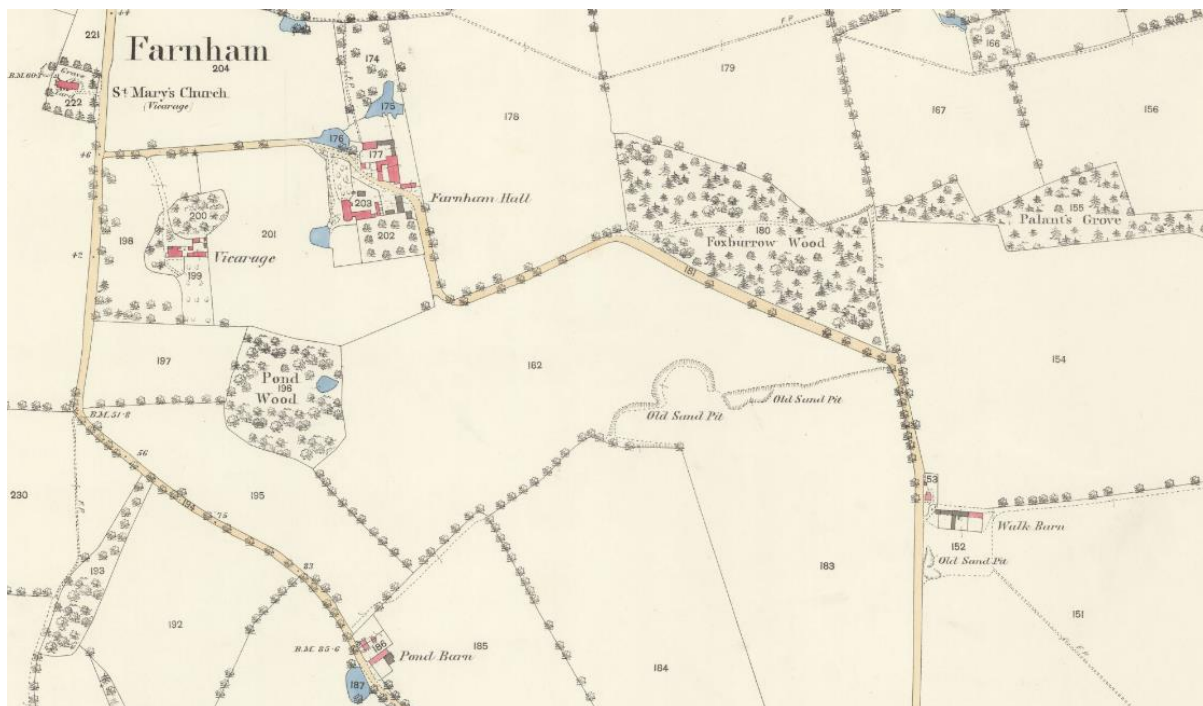
3.12 Two Ordnance Survey Maps (OS) at a 25-inch scale provide detailed information at the end of the C19 and early C20. The first map dates from 1883 and provides more detailed information than the Hodkinson map. This shows all the heritage assets identified in this report. The colouring of the map highlights the main buildings and the ponds in the locality.

3.13 The Hall can be seen as having an eastern wing which was replaced in the 1920's. The layout of the estate buildings is in two clear courtyard arrangements which includes the barns which have been converted to residential units, to the north east of the hall.



3.14 The greater level of detail identified the footpaths as well as the roads, including the path which passes from Friday Street to Farnham via Mollett's Farm, located north of the Farnham Hall road. This track follows the boundary between the Parish of Farnham to the south and Benhall to the north. There is also the more significant private road which provides an east west route past the Hall to Foxburrow Wood and on to Walk Barn. Old sand pit workings are denoted near to Walk Barn.

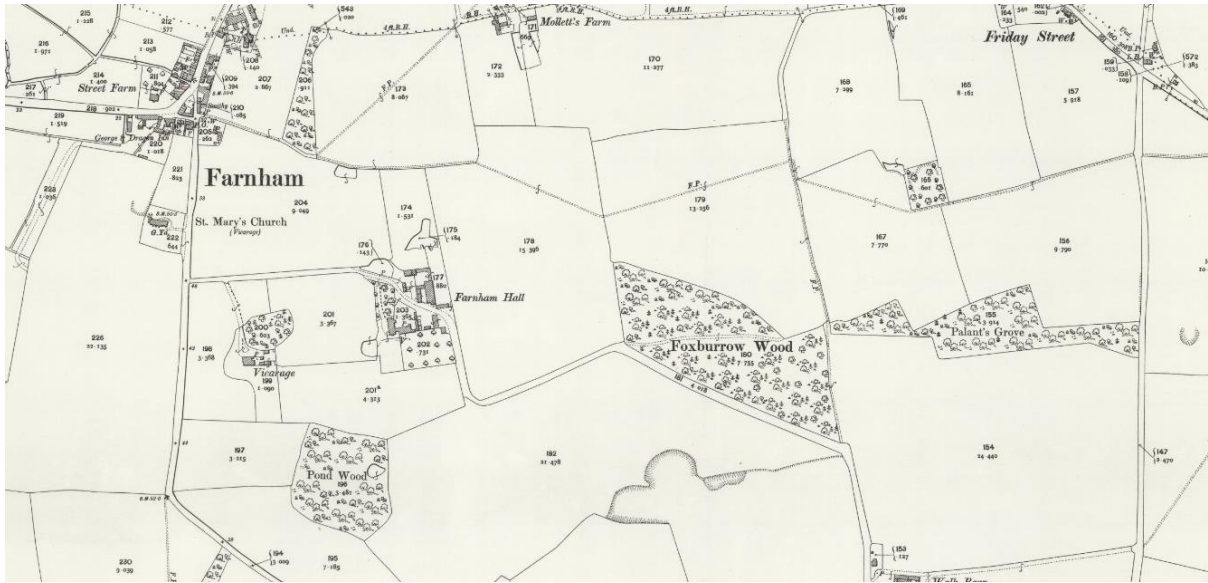
3.15 It is noted that by 1883 the Saxmundham to Aldeburgh railway had been built (1859) to the east of the proposals area.



1883 Twenty-Five-inch OS map (Reproduced with permission of National Library of Scotland)

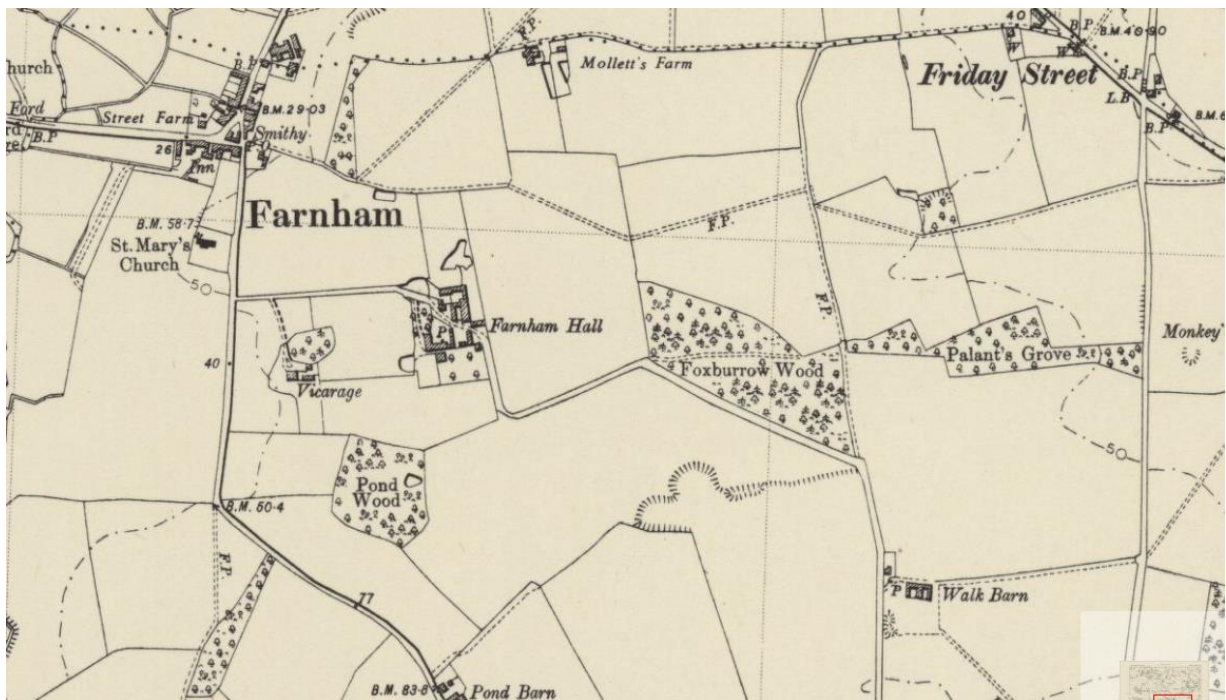
3.16 The next map in the series dates from 1904. There is very little difference between the maps in terms of changes to the buildings denoted or the woodland areas identified. The main changes to the Hall have yet to be undertaken.





1904 Twenty-Five-inch OS map (Reproduced with permission of National Library of Scotland)

3.17 The final map in the series is the 1951 map in the Six-inch series and shows the Manor/Hall after the wing extension which exists today had been added. Again, there is little change between this and the earlier two OS maps.



1951 Six-Inch OS map (Reproduced with permission of National Library of Scotland)



# 4 Summary of the Heritage Policy Context

## National legislation

4.1 The statutory requirements of Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the decision maker in considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Section 72 of the same Act requires special attention be given to the desirability of preserving or enhancing the character and appearance of a conservation area.

## National guidance

4.2 National planning guidance is set out in the NPPF (2019). This document establishes a presumption in favour of sustainable development (paragraph 11). Proposals that accord with the development plan should be approved without delay. Section 16 of the NPPF sets out policies aimed at conserving and enhancing the historic environment. Paragraph 192 directs local planning authorities to take account of:

- the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the positive contribution that 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.

4.3 Paragraph 193 sets out that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to an asset's conservation. Paragraph 194 sets out that any harm to the significance of a designated heritage asset should require clear and convincing justification. Substantial harm to assets of



the highest significance including Grade II\* Listed Buildings and Scheduled Ancient Monuments should be wholly exceptional.

4.4 Paragraph 196 sets out the position where less than substantial harm to the significance of a designated heritage asset is held to occur. Any such harm should be weighed against the public benefits of the proposals.

## **Local Plan Policy**

4.5 The Suffolk Coastal Local Plan covering the period 2018-2036 was formally adopted in September 2020. The Policies of relevance are:

### **Policy SCLP11.1 Design Quality**

4.6 This requires that proposals for development should demonstrate an understanding of the key features of local character and seek to enhance these features through innovative and creative means.

### **Policy SCLP11.3 Historic Environment**

4.7 This requires that all development proposals which have the potential to impact on heritage assets or their settings should be supported by a Heritage Impact Assessment and/or an Archaeological Assessment prepared by an individual with relevant expertise. Pre-application consultation with the Council is encouraged to ensure the scope and detail of a Heritage Impact Assessment or Archaeological Assessment is sufficient. The level of detail of a Heritage Impact Assessment should be proportionate to the scheme proposed and the number and significance of heritage assets affected.

### **Policy SCLP11.4 Listed Buildings**

4.8 Proposals to alter, extend or change the use of a listed building (including curtilage listed structures) or development affecting its setting will be supported where they:

- A. Demonstrate a clear understanding of the significance of the building and its setting alongside an assessment of the potential impact of the proposal on that significance;
- B. Do not harm the character of the building or any architectural, artistic, historic, or archaeological features that contribute towards its special interest;
- C. Are of an appropriate design, scale, form, height, massing and position which complement the existing building;



- D. Use high quality materials and methods of construction which complement the character of the building;
- E. Retain the historic internal layout of the building; and
- F. Remove existing features that detract from the building to enhance or better reveal its significance.

## **Historic England Guidance**

4.9 The main guidance produced by Historic England of relevance to this application is

- **The Setting of Heritage Assets – Historic Environment Good Practice Advice Planning Note 3 (2017).**





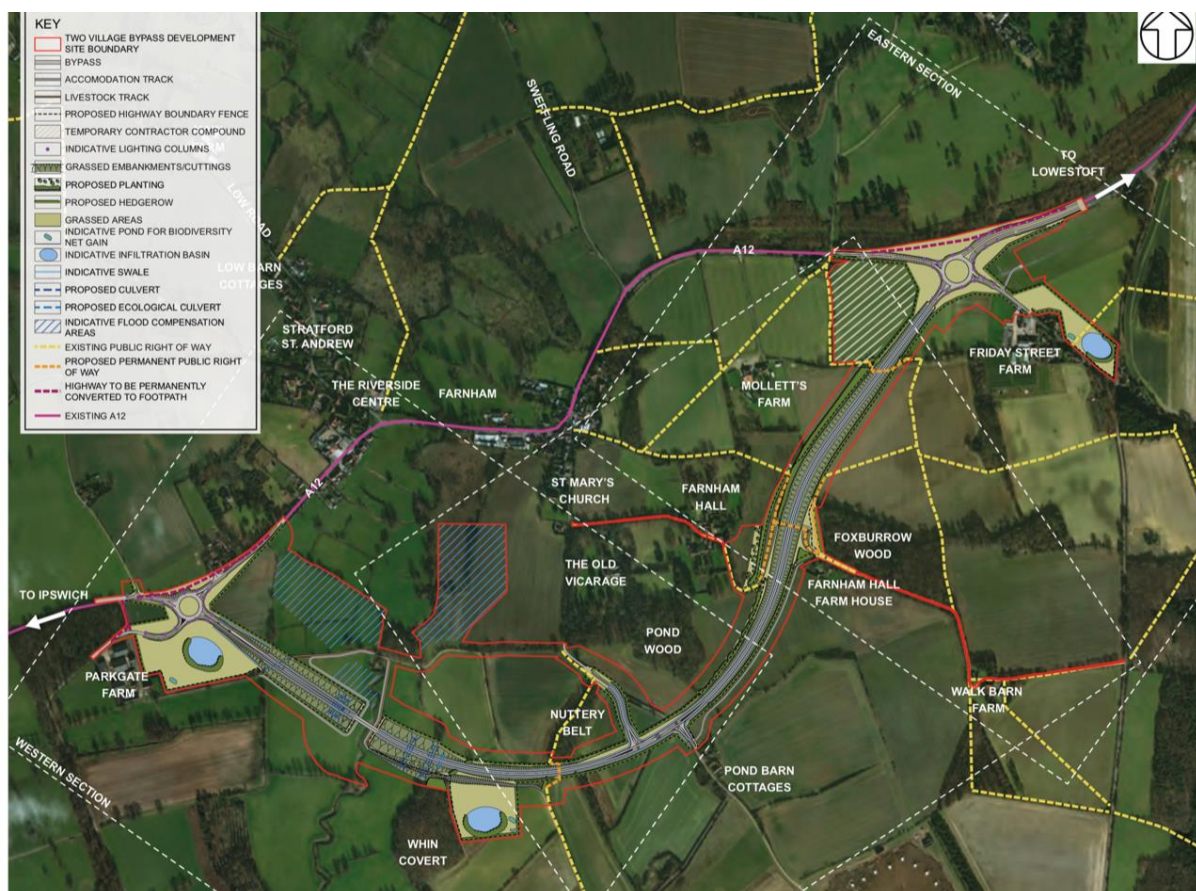
# 5 The Proposals

5.1 This report has been prepared with regard to the proposed realignment of the A12 as part of the 2 Village Bypass proposed by EDF as part of the proposed Sizewell C development.

5.2 FERN (Farnham Environment Residents & Neighbours) have sought for this independent report to be commissioned as they do not consider an adequate heritage impact assessment has been carried out on the proposed route.

5.3 The route tabled by EDF has evolved from a Study undertaken by AECOM in 2011. The archaeological report prepared by Suffolk CC in association with the previous scheme noted in paragraph 3.1 *'the proposed road improvement will have a major impact on the landscape and archaeological heritage of the area'*.

5.4 Farnham Parish Council are seeking for a more easterly route for the bypass (Response March 2019).



Proposed route for Bypass (EDF)



# 6 Assessment of Significance

6.1 The NPPF (2019) sets out in paragraph 189 that in determining applications local planning authorities should require applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. It also makes clear that the level of information required should be ‘proportionate to the assets’ importance, and no more than is sufficient to understand the potential impact of the proposal on their significance’.

6.2 Heritage assets and significance are defined in the Glossary in Annex 2 of the NPPF. The definition of heritage assets includes both national designations and assets identified by the local planning authority. The NPPF definition of significance states that ‘heritage interest’ may be archaeological, architectural, artistic or historic, and that significance derives not only from a heritage asset’s physical presence, but also from its setting.

6.3 Heritage interests are defined as follows:

***Archaeological interest** in a heritage asset is if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point (NPPF 2<sup>nd</sup> ed., Annex 2).*

***Architectural and artistic interest** derive from the way in which people draw sensory or intellectual stimulation from a place, which can be the result of conscious design or by the fortuitous outcome of the way a place has developed over time. (Derived from definition of aesthetic value in Conservation Principles, Policies and Guidance, English Heritage, 2008).*

***Historic interest** derives from the way past people, events, and aspects of life can be connected through a place to the present, often by the meanings of the place for these people who relate to it, or for whom it figures in collective memory or experience. (Derived from definition of historical value in Conservation Principles, Policies and Guidance).*

6.4 Setting is defined in Annex 2 of the NPPF as follows:

*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.*

6.5 Historic England's 'Historic Environment Good Practice in Planning: 3 The Setting of Heritage Assets' (2<sup>nd</sup> ed. 2017) makes it clear that setting is not a heritage asset and can only contribute towards the significance of a heritage asset. This document sets out a series of attributes that it may be appropriate to consider when assessing significance listed under two main headings: the physical surroundings of the asset, including its relationship with other heritage assets; and the way that the asset is experienced.

6.6 The identified heritage assets identified as being in proximity to the EDF bypass route are considered in terms of their heritage value and significance:

### **St Mays Church**

6.7 This is a Grade II\* building on the plateau area above the River Alde to the western side of the road route.



*St Mary's Church*



### Archaeological interest – Very high

6.8 The building contains surviving Norman features and is highly graded for the wall paintings within the church and its internal fittings including the fragments of a Rood screen. The external fabric contains dateable features including fragments of Roman tiles.

### Architectural and artistic interest – Very high

6.9 The church is Grade II\* listed and it is noted that the building was Listed as early as 1966. The building is constructed of a mix of brick and flint. A bequest of 1471 by a Robert Palmer was of 10,000 bricks for the church which unusually seem to include both buff and red bricks notably used on the tower and buttresses.

### Historic interest –Very High

6.10 As one of the religious focal points for the settlement in the area the building has interest both in terms of the associations and bequests made with respect of it and also as part of the collective community memories.

### Setting



*View from south side of church looking west to Stratford St Andrew*





6.11 The church is located on the edge of the flat plateau area to the south of the current village and forms a landmark feature in the views toward Farnham. The building is read in the context of open fields and the trees following the line of the river. The immediate setting is the graveyard and there are views both west and south from this area.

### Contribution to other heritage assets

6.12 The building is set away from the core of the village of Farnham but the church and tower forms a visible feature when driving along the present route of the A12. Martin on page 88 of the Historical Atlas of Suffolk note that an important feature of the medieval landscape of Suffolk was the occurrence of parish churches and manorial halls in paired isolation. He states that this is likely to reflect a Late Saxon settlement pattern. Given that this is the relationship at Farnham the historic landscape could thus date from the Late Saxon period.

6.13 Views from the church site towards Stratford St Andrew include the tower of the Church of St Andrew, notably when the trees are not in full leaf.

### Farnham Hall complex



*Farnham Manor (formerly Hall) principal elevation*



6.14 This comprises the Grade II listed Manor (Originally Farnham Hall). It includes the east wing now four units which are Farnham Hall, and a variety of converted out buildings and barns and former estate cottages.

### Archaeological interest – High

6.15 The HERS records note one find within the curtilage of the Manor – a Neolithic/early Bronze Age find (SFNM 026) There is a high probability that there was an earlier house on the site and this may relate to the ponds in the locality of the site. The standing fabric provides evidence of continuous occupation from the C17 onwards.

### Architectural and artistic interest - High

6.16 The main building is Grade II listed. Collectively the house, with its relatively modern wing and related buildings and garden features such as the walled garden form a collective group of interest as a small country estate.

### Historic interest – High

6.17 The site is of interest as part of what was probably the medieval pattern of development of farmsteads and manors in the area, with this site developing away from the main village in association with the church. The site forms part of the collective memory of local people whose families may have lived or worked on the estate.

### Setting

6.18 The development of an eastern wing (the map evidence showing that there was a wing in this location prior to that which exists today) had given the main outlook to the house (now five units) to the south looking towards the private garden areas, the tennis courts and the walled garden. The walled garden is only walled on three sides with the southern aspect remaining open and thus the vista to the open countryside is unenclosed.







*View north to the Manor and Hall*

## Contribution to other heritage assets

6.19 The informal grounds of the Manor extend to the south west to Pond Wood and the paddocks and grounds of the Old Vicarage to the west. The area includes a large pond and mature trees. The Old Vicarage is glimpsed through the trees.

## Hill Farmhouse

6.20 The site contains the Grade II listed farmhouse. This site is located south of the proposed route of the road and the main village. The farmhouse has a substantial central chimney stack which forms a visual focal point in the views from the access lane to the site. The farm is adjacent to a courtyard of barns including a threshing barn and pig sty. These are principally constructed of brick and pan tiles. The threshing barn has a corrugated tin roof and may have originally been thatched.



### Archaeological interest - High

6.21 The site contains standing fabric from the late C16 so there is likely to be below ground evidence of occupation from this period onwards.

### Architectural and artistic interest - High

6.22 The farmhouse is listed Grade II and is an example of a late medieval farmstead in the locality. It is a timber framed and a brick and rendered building. The building has an L shaped plan with a front cross wing. It has a substantial cat slide roof to the north elevation. From the size and form of the chimney stack this was a high status farmhouse, built to express the wealth of the owner.

### Historic interest – High

6.23 The site forms part of the pattern of late medieval farmstead development in the area. The site would have memory associations with the people who have lived or worked on the farm.

### Setting

6.24 The farmstead is set on the lower land south of the main plateau area. The farm is set on its own away from the public highway within farmland. Views of it are afforded from the lane over the surrounding hedgerows and trees. The main chimney stack forms a prominent feature in the locality.

### Contribution to other heritage assets

6.25 The site is more isolated from the other heritage assets and is part of the pattern of more dispersed farmsteads to the south of the village. The farm is closest to Pond Barn Cottages.







Hill Farm

## Rose Hill Farmhouse

6.26 The site contains the Grade II listed farmhouse and an outbuilding. The main farmhouse is dated 1819 but behind this is an earlier building dating from the C18. The complex is located on the A1094 and is enclosed from the surrounding farmland by woodland. The cluster of redbrick cottages including Rose Hill Cottages 1 & 2 appear to be former workers cottages associated with the farmstead.

### Archaeological interest - High

6.27 The site is not identified as containing any finds in the HERS records.

### Architectural and artistic interest - High

6.28 The farmhouse is listed Grade II and is of brick construction. The principal elevation faces the road and is symmetrical centred on a central front door. The front section of the building has a hipped slate roof. The building has a Regency style to it.



## Historic interest – High

6.29 The site is part of the later post medieval farmsteads which appear to have developed to the northern part of the study area.

## Setting

6.30 The farmstead is located on the A 1094 Friday Street/Aldeburgh Road to the east of Farnham. The immediate setting is the road. The buildings have a woodland backdrop to them.

## Contribution to other heritage assets

6.31 The site relates to the other farmsteads in this part of the study area including Friday Street Farm and Mollett's Farm.



*Rose Hill Farmhouse 2005 (HE Archive I of E : Mr H Smith)*





6.32 The non-designated heritage assets are also considered:

### **The Old Vicarage**



*View from north drive of The Old Vicarage*

6.33 This is a mid C19 red brick building with the principal elevation to the south elevation. The substantial building is set within landscape grounds with adjacent woodland.

#### **Archaeological interest - Low**

6.34 The HERS records do not indicate any archaeological investigations on the site. Given its location between the Hall and the Church site there is potential for below ground remains on the site.

#### **Architectural and artistic interest - Moderate**

6.35 The house is not listed but is a fine C19 former vicarage building. It is not known to be by any specific architect and is most likely a 'pattern book design' but more research is needed to confirm this.



## Historic interest – High

6.36 The former vicarage is of interest as part of the former quasi-public buildings which residents would be familiar with and probably visit therefore it forms part of the local collective memory and association.

## Setting

6.37 The house is set within its own grounds and set back from the public highway and the private Hall road. It is glimpsed through the mature landscaping on the site.

## Contribution to other heritage assets

6.38 The site forms part of the cluster of manorial and ecclesiastical buildings to the south of the village with the Church and the Hall as the foci.

## Pond Barn







*Pond Barn Cottages and barns to the east*

6.39 This comprises two cottages and related farm outbuildings to the east are south of the proposed road alignment. They are on the lower land south of the plateau. A large pond is located opposite the cottages and barns on the south side of the road.

#### Archaeological interest - High

6.40 There has been Roman finds within the locality so there is high potential for below ground finds on or near to the site.

#### Architectural and artistic interest - Moderate

6.41 The cottages date from the early C19 and were probably built as agricultural workers cottages. They appear on the 1883 OS map with what appears to be a larger structure to the south east. The cottages are brick faced with a pan tile roof. They share a central chimney stack. The windows are all replacement. To the east is a courtyard of single storey out buildings arranged in a U shape with the open side to the road. These are also considered to be early C19 and are constructed of brick and weather boarding with pan tile roofs. The outbuildings appear to be unused.



## Historic interest – Moderate

6.42 The site forms part of the post medieval development relating to the farmsteads in the area.

## Setting

6.43 The site is south of the Farnham Hall site and the photos in Appendix 3 illustrate that there is inter-visibility between the site. The cottages are surrounded by open farmland enclosed by hedge and stands of trees. The large modern reservoir to the northeast forms a large bunded feature in close proximity. Pond Wood is also very visible from the site.

## Contribution to other heritage assets

6.44 The cottages are closest to Hill Farm which is visible across the hedges to the south of the site. There are views across the open farmland to the north to Farnham Hall notably the walled garden and the modern farmhouse of Farnham Hall Farm (not a heritage asset) at the edge of Foxburrow Wood is clearly visible and this can be used to orientate the other landscape features and built form in the locality.

## Mollett's Farmhouse

6.45 The site contains the C17 farmhouse although it is understood only part of this remains following a fire. There is also a barn to the west of the farmhouse which appears on the 1841 tithe map but this has been part rebuilt and converted to residential use. The site is used for tourism with self- catering holiday lets and caravans.

## Archaeological interest - High

6.46 The site contains earthworks which the HERS records as being possibly pre Norman Conquest. The 1994 SCC archaeological report identified medieval pottery in the area of the Farm suggesting a medieval settlement here.

## Architectural and artistic interest – Moderate

6.47 The loss of part of the building following the fire has impacted on the significance of the standing fabric. The building is timber framed and rendered. It comprises the main house with north facing porch and a gabled western cross- wing. The roof is covered with pan tiles and the chimney is centred on the main entrance which suggests a lobby entry plan form.



## Historic interest – Moderate

6.48 The standing forms part of the pattern of the post- medieval farmstead development (C17) to the northern part of the study area and the site appears to contain archaeological evidence of earlier medieval settlement. Both the farmhouse and one of the adjacent barns contain fabric dated to the early C17 (Survey by Leigh Alston 2011).

## Setting

6.49 The farmstead is set within the generally level farmland on the plateau area. The farmstead is orientated north south so that the rear elevation faces out over the open fields to the south and the line of the proposed new road. The farm is on the main northern footpath linking Friday Street to Farnham. It is set back from the main road but is visible in views from the present A12 and from the surrounding footpath network. The buildings form a focal element in the views to the north east of the Manor. There are views of Molletts Farm from the eastern side of the Hall complex. The Hall is not visible in views from the farm due to the large number of trees within the manor complex.

## Contribution to other heritage assets

6.50 Mollett’s Farm is visible from the Hall site and is on the public footpath which runs north of the Hall site. It is part of the pattern of farmsteads to the north and east of the Hall which date from the post medieval period.



*Mollett's Farmhouse*





## Walk Barn Farm - barns

6.51 The site contains a bungalow of no historic significance but it is adjacent to a group of earlier barns.



*Walk Barn barns*

### Archaeological interest - High

6.52 From only an external view of the barns they appear to be early C19 in date and are certainly in existence at the time of the 1883 OS map. The map suggests the farmhouse stood to the east of the barns but is no longer standing.

### Architectural and artistic interest - High

6.53 The buildings show the continuum of timber framed farmstead buildings in conjunction with locally made bricks. There are strong similarities with the U-shaped complex at Pond Barn.



## Historic interest – High

6.54 The buildings are of interest as part of the pattern of farmsteads in the area and may be indicative of the boom in farming at the turn of the C18 when investment in model style farms was supported by high grain prices.

## Setting

6.55 The farmstead is set to the arable fields to the south east of the Hall site. There are long open views to the west including views to the southern boundary of the Hall including the walled garden and the clumps of woodland.

## Contribution to other heritage assets

6.56 The site is accessed by the Hall road. This has mature trees and banked sides in places and thus has the appearance of an ancient greenway. This routeway also forms part of the historic settlement pattern in the area which is important to the understanding of the linkage between the various identified heritage assets.

## Significance of the heritage assets

6.57 Using the classification in the table below the identified heritage assets are considered in terms of the overall heritage significance. Only the Parish Church of St Mary falls into the first column.

Grade I (and II*) and SAM		Grade II
Exceptional	Possesses features of very high significance which survive in a relatively unaltered state. These define why the building has a high listing. The loss or serious alteration of such features is likely to result in 'substantial harm' to the heritage significance.	
Considerable	Possesses features which make an important contribution to the special architectural or historic interest of the	A feature which is important to the special architectural or historic interest of the heritage asset. The loss of or



	asset. The loss or major alteration of such features may constitute 'substantial harm'.	major alteration to such features may constitute 'substantial harm' to its heritage significance
Some	A feature which makes some contribution to the special architectural or historic interest of the heritage asset. The loss of or major alteration to such features may constitute 'less than substantial harm'.	A feature which makes some contribution to the special architectural or historic interest of the heritage asset. The loss of or major alteration to such features is likely to constitute 'less than substantial harm'.
Local	A feature which makes little contribution to the special architectural or historic interest of the heritage asset. The loss of or major alteration to such features may constitute minimal harm to heritage significance.	A feature which makes little contribution to the special architectural or historic interest of the heritage asset. The loss of or major alteration to such features is likely to constitute minimal harm to heritage significance.
None	Features making no contribution to the special architectural or historic interest of the heritage asset which can be removed or altered without any harm to heritage significance.	Features making no contribution to the special architectural or historic interest of the heritage asset which can be removed or altered without any harm to heritage significance
Negative or intrusive	Those elements which actually detract from the value of a site and where its removal may be a clear benefit.	Those elements which detract from the heritage significance and their removal may be a clear benefit.





6.58 The following table summarises the assessment of the identified assets.

Identified asset	Designation	Heritage significance
St Mary's Church	Listed Grade II*	Exceptional
Farnham Manor (Hall) and related outbuildings	Listed Grade II Non-designated heritage assets	Considerable
Hill Farmhouse	Listed Grade II	Considerable
Rose Hill Farmhouse	Listed Grade II	Considerable
The Old Vicarage	Non-designated Heritage Asset	Local
Pond Barn complex	NDHA	Local
Mollett's Farm	NDHA	Local
Walk Farm barns	NDHA	Local



# 7 Independent Heritage Impact Assessment

7.1 The potential impact of the proposed development is now considered with regard to the identified heritage assets.

## Direct Impact

7.2 The application proposes no direct physical impact to result in the demolition on any of the identified heritage assets.

## Impact on setting

7.3 The impact of the proposed development by way of the setting of the identified assets has been assessed using the guidance set out in the Historic England Good Practice Advice Planning Note 3 – The Setting of Heritage Assets (2017).

## Checklist of potential attributes of a development affecting setting

7.4 Following the Historic England Guidance the Assessment Checklist on page 13 has been followed with respect of the heritage assets.

Potential attributes/experience	The site
Proximity to the asset	The route of the bypass proposed by EDF is in close proximity to the heritage assets identified on the previous pages – with the listed building of Farnham Hall and the group of buildings relating to the manor being the closest designated asset to the route. However, there are a number of non-designated heritage assets close to



	<p>the route including Pond Barn Cottages and Molletts Farm.</p> <p>The setting of all the identified assets needs to be considered including both visual but also other issues such as noise, movement, lighting etc.</p>
Position in relation to topography	<p>The proposed route of the road runs from the north east by Friday Street and follows a loop around the main plateau area on which the Church and Manor are located. The route will largely run through open fields and cross the river Alde valley before rejoining the A12 by Little Glemham Park.</p>
Inter-relation of the assets	<p>The proposed road will impact on the historic landscape and archaeology of this area and the setting of all the identified heritage assets. The assets are inter-related in a number of ways. Firstly, the farmsteads identified form part of the pattern of the rural development in the locality from at least the medieval period onwards. The footpaths and roadways in the area show the historic links between settlements and properties with a strong east -west pattern. The location and past inter relation of the manor, church and village also need consideration.</p> <p>There are views across the central open fields from the lane leading to Pond Barn and Hall Farm. The identified heritage assets to the southern side of the study area have strong intervisibility with the manor site and the belts of woodland on the line of the private road and Pond Wood to the west which the new road would have a very strong adverse impact on. Photos 15 and 16.</p>
Experience of area	<p>The location of photos of the area are identified on a Google Map in Appendix 3. Further commentary is given on this below.</p>



Orientation	The route proposed runs south of the present A12 with heritage assets identified on both sides of the proposed alignment but with the main village to the north of the route.
Openness	<p>The overall sense when walking through the area is one of an open farmland area where the historic farmsteads form the key buildings in the landscape. There are shelterbelts and woodland belts in the locality which restrict the views. The focal heritage assets in the locality are the Church of St Mary's and the Farnham Hall complex with views to and from these sites over the surrounding countryside.</p> <p>See photos 1,2,5,6,8, 9, 11, 12, 13, 15, 16 and 17</p>
Degree of change over time	<p>The settlement pattern in this area south of the village of Farnham is assessed as having changed very little from at least the medieval period. The plateau may also be the site of earlier settlement with the limited archaeology undertaken to date suggesting Roman occupation in the area.</p> <p>The introduction of the new road would thus be a new and alien element in the landscape and setting of the identified heritage assets.</p>
Prominence or dominance of the development	The new road will form a major intervention to the countryside cutting through the farmland and historic routeways crossing the area. It will introduce development in close proximity to the Hall and scattered farmsteads which have historically and currently enjoy a rural setting and outlook. The noise and awareness of the present A12 is largely as background noise.





Competition with the assets	<p>The development from at least from the medieval period has been restricted to largely farmsteads or related to the church.</p> <p>The pattern of movement through the area has changed little and the pattern of the built form is one which has a strong historic background to it with little change in the C20.</p> <p>The visual association of the heritage assets to each other is important and is part of the understanding of the historic landscape and the hierarchy of the buildings. The Hall and Church are the two key secular and ecclesiastical buildings and their visual prominence underlines their past social importance to the village and its hinterland.</p>
Visual permeability	<p>There are long views across the river valley from the Church yard (Photos 1-3) and also between the farmsteads in the area. The Hall has its main habitable rooms to all three floors facing south and it is noted that the walled garden has an unenclosed southern boundary given open views across the landscape to the south. (Photos 5 &amp; 6)</p> <p>The distances viewed are defined and enclosed by the tree belts/woodland stands, but the openness of the large fields mean that there is a clear interconnection between the identified assets.</p>
Introduction of movement and activity	<p>The character of the area will change from a quiet rural location to one where there will be far more awareness of noise, activity and movement focused on the new bypass.</p>
Diurnal or seasonal change	<p>The amount of screening of the roadway will vary seasonally by virtue of the amount of leaves on the trees. However, where key vistas exist which are not screened</p>



	by trees – notably the views from the churchyard and the manor the change will be far more limited.
Impact of lighting	The locality has very low levels of lighting focused on the residential properties in the area. There are no street lights to the lanes and private drives. The introduction of lighting either along the road or from car headlights will introduce a new and intrusive element to the historic landscape.
Changes to the built surroundings/land use	The setting and context of all the heritage assets identified will change from one where the historic landscape has predominance to a situation where the presence of the new roadway will be the dominant element.
Changes to skyline	The skyline views in the area are largely derived from the trees and landscape features in the area, with any built form generally being low key in the views. The Church and Hall are viewed in the context of trees. Photos 4, 7 and 14.
Noise, odour, vibration etc	The level of noise generated from the use of the proposed bypass is considered to represent a significant change to the character of the area. The noise from vehicles will become a far more dominant element to the locality.
Changes to public access or amenity	The public footpath to the north of the Hall and the private road to the Hall (Photo 10) and beyond are both considered to be historic routeways which are denoted on all the maps set out in the regression. These will be severed by the bypass.



Changes to the historic landscape

The proposals will introduce a large scale intrusive modern element into what survives as a historic landscape setting containing a number of heritage assets.

## Summary

7.5 The proposals are therefore assessed as introducing a visually intrusive development within a historic landscape setting. The scale and nature of the development is held to adversely impact on the identified heritage assets visually and by virtue of the increased level of movement, lighting and potential odour impact. The tranquil rural setting will be changed by the proposals and the enjoyment of walking along the Hall road and the related footpaths will be compromised by the introduction of this development.

7.6 The understanding and appreciation of the identified heritage assets is derived from their identification within a historic landscape setting. The location of the farmsteads can be understood by the extent of the common land. The heritage assets have a group inter relationship which would be harmed by the location and form of this development.

## Implications for the heritage assets

7.7 Specific regard is given to the Farnham Hall complex of buildings given that the Manor is the closest Listed Building physically to the routeway but also that it is part of an important collective group of heritage assets. Given its historic secular importance as the manor, the relationship and interconnection with both the village and the surrounding farmsteads is important. The proposed road will impact adversely on the setting of the site including severing the past historic routeways in the area. The understanding and appreciation of the site will therefore be harmed by the proposals.

7.8 The provisions of paragraph 193 of the NPPF seek that great weight should be given to the assets conservation and the more important the asset the greater the weight should be. The potential impact of the proposals on the Grade II \* church should therefore be given the highest weight, with the impact on the Grade II listed buildings including the Hall following on from this. The impact must also be considered on the non-designated heritage assets.



7.9 It is maintained the impact must be considered both in terms of the individual buildings but also collectively and the group value of the buildings within this historic landscape must be given great weight.

## **Visual assessment**

7.10 This statement is supported by a visual assessment with non - rectified photos included in Appendix 3 to illustrate the existing visual appearance of the area to form the base line with which to assess the visual harm of the development.

7.11 In Appendices 4 and 5 viewpoints and photos moving along the roads and footpaths in the locality have been identified where the development can be shown to have a significant impact on the experience of the heritage assets which contributes to the setting and significance of these assets.

## **Level of harm**

7.12 The assessment which has been undertaken establishes that the proposed bypass would result in harm to the setting and experience of at least 19 identified heritage assets. This covers a number of effects not just visual impact. The overall level of harm is held to fall into 'less than substantial harm' but to the very high end of this spectrum. It is stressed the harm resulting is to assets of the highest significance. The NPPF is clear that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm. The harm here is at the top end of the 'less than substantial' category and given the asset's significance, the weight afforded to that harm should be very high indeed."

## **Heritage Benefits**

7.13 No heritage benefits have been identified as resulting from the development.





# 8 Review of the Sizewell C Project – Vol 5 Two Village Bypass Chapter 9

## Identification of heritage assets (page 20-21)

8.1 It is noted that Farnham Manor is only recognised as being one entry and does not acknowledge that the site contains a number of structures related to the main listed Manor, including former farm outbuildings and the walled garden area and collectively of heritage significance.

8.2 It is noted that neither Hill or Rose Hill Farmhouses (both Grade II Listed) are identified in the study.

8.3 The relationship of the Manor with Foxburrow Wood is acknowledged in para 9.4.56.

8.4 The potential for archaeology on the Hall site is acknowledged but this has not been investigated (See Section 9 below).

8.5 This report concurs with the conclusion set out in para 9.4.57 that the natural and built features to the southern side of the Manor have been built or maintained to afford clear views to the open countryside to the south of the site. However, it is not accepted that the views of the standing built form of the Hall does not relate to the wider landscape as set out in para 9.4.59.

8.6 Para 4.118 only identifies the barns and not the associated cottages as a collective NDHA group.

8.7 There is no recognition of:

- The Old Vicarage
- Mollett's Farm complex
- Walk Barn
- The footpath to the north of the Hall.



8.8 There is also considered to be inadequate consideration of the outbuildings associated with Farnham Hall (Manor) including the walled garden.

8.9 The archaeological interest of Farnham Hall is held to be unaffected (para 9.6.12) however the exact nature of that interest has not been evaluated.

## **Assessment of impact**

8.10 The impact on Farnham Hall is assessed as being a minor adverse effect which would not be significant. The impact is assessed as only coming from the construction activities which are assessed to be short-term. This assessment is considered to be fundamentally flawed as this does not have adequate regard to the long term 'urbanising' impacts which include as well as visual impact the noise, movement and lighting impacts from the road. In paragraph 9.6.65 the audible effects are dismissed as not contributing to the loss of historic interest and in paragraph 9.6.66 the over impact is held to be not significant. This low level of harm is not accepted as part of the special character and appearance of the site is derived from the piece and tranquilly derived from the association with the farmland to the south.

8.11 The long-term impact on St Mary's Church is also held to result in no effect. This does not recognise the visual impact on the setting of the church and the environmental changes to the context of the church including increased noise, movement and lighting within the context of the river valley. In paragraph 9.6.67 the report does accept '*Noise from the operation of the proposed development would be audible from the churchyard*' but then concludes that would be no discernible impact on the heritage significance of the building. Given that this is a Grade II\* building of the highest significance, where the NPPF states harm should be wholly exceptional (Para 194) it is considered that inadequate weight has been given to the potential impact on the peace and tranquillity of the church and its graveyard. This is considered to be very important to the special character of the building and its setting.

8.12 The impact on Pond Barn is held to be mitigated by the planting and topography. This does not reference the fact the setting will be changed to separate the site from the existing legible historic landscape and association with the other farmsteads in the area.

8.13 The report acknowledges in para 9.6.56 that 'The historic and aesthetic interests of the historic landscape character of the study area would be eroded by the proposed development'. The assessment concludes that the new planting in the area would offer mitigation for the aesthetic impact. This is not accepted as the loss of trees along historic routeways and field boundaries is part of reading and understanding the historic landscape.



The provision of trees that follow new boundaries does not mitigate for the significant harm resulting by the loss to the historic landscape.

## **Conclusions**

8.14 The overall conclusion is that the assessment has not adequately identified all the heritage assets in the locality. It has not adequately assessed the significance or heritage value of the assets. Nor has the EDF report provided a convincing or clear assessment or justification of the potential impact of the proposals on the setting of the identified assets or the wider historic landscape in which they are located. It has failed to acknowledge the interconnectivity between historic buildings and features and as a result the overall findings of no or minor harm resulting are considered to be flawed.



# 9 Review of EDF Environmental Statement Addendum Chapter 5 (Jan 2021)

9.1 The addendum has included an archaeological evaluation report (Appendix 5.8) prepared by Cotswold Archaeology. This follows an evaluation carried out in 2019.

9.2 A series of trenches have been carried out on the farmland on the route of the proposed road.

## Response

9.3 It is noted that the evaluation does not extend wider to establish the archaeological significance on any of the heritage asset sites which are adjacent to the routeway, notably in the area of the Hall or any of the farmsteads. The archaeological value of the identified assets has not therefore been established, in particular for the area in which the church and former vicarage and the Hall/Manor are located. It is held to be of paramount importance in evaluating the potential impact of the bypass on both the significance of the historic landscape and on the identified asset sites that their significance is fully understood.





# 10 Review of the Joint Local Impact Report (May 2021) Suffolk CC and East Suffolk Council

10.1 The Two Village Bypass scheme is considered in paragraph 6.63 which includes the following text:

*The construction of the Two Village Bypass will create a road that cuts across the existing fabric and field pattern of the landscape and which has no historic connection with the evolution of that landscape which currently shows a long-established network of connectivity between places and a long-established pattern of use. In many respects the construction of any new road will have such impacts, but in this case, there are also instances of historic landscape connectivity such as that between Farnham Hall and Foxburrow Wood that will not only be lost, but also will be further adversely emphasised by new roadside planting which are not aligned with traditional landscapes features and boundaries.*

## Response

10.2 The response acknowledges the interconnectivity and pattern of routeways which this independent assessment has noted. It however only considers the impact on the setting of Glemham Hall.

10.3 The built heritage for the proposals as a whole are considered in Section 12 (para 12 1-7). The main conclusion is that the mitigation proposed to heritage assets directly affected is very limited. Appendix K does identify there will be impact on Farnham Hall, St Mary's Church and Little Glemham Hall. None of the other assets identified in this independent statement have been identified. This level of impact is identified as being 'significant adverse'



10.4 The joint response raises the following concerns:

- The impact on the historic landscape character of the area has been assessed as being of low heritage significance by EDF and this is not supported.
- The Applicants ascribe there being no significant effect on Farnham Hall which is not supported.
- The visual and physical severance of the Hall from Foxburrow Wood has not been given due regard.
- Little consideration has been given to mitigation measures.

10.5 Balanced against the potential harm is the identified heritage benefits to the historic properties in Farnham and Stratford St Andrew along the line of the existing A12 which the joint response document identifies as being a significant benefit.

10.6 Whilst the review has identified areas of concern with regard to the heritage assessment undertaken by EDF, it has not challenged the overall findings. It has not challenged the assessment as not having adequate regard to the tests which the heritage legislation requires. On this basis the review is considered to be inadequate in its response to the potential heritage impact.



# **11 Stratford St Andrew & Farnham Parish Council Suggested Alternative Route**

11.1 One of the fundamental concerns raised by FERN is that the route proposed follows the alignment tabled in an AECOM report of 2011. The report stated further investigation was needed on the precise location of the road.

11.2 The Parish Council are suggesting an alternative route be assessed to the east of Foxburrow Wood – the exact route of which has not been defined nor assessed within this report. This alternative option should be fully considered given that it offers the following advantages:

- Moves the line of the road away from the key group of heritage assets focused on Farnham Hall (Manor) thereby reducing the potential impact on these.
- Preserves the main routeways to the Hall including the one to Foxburrow Wood and most of the historic routeway to the north past Mollett's Farm.

11.3 It is acknowledged any revised route would need to be fully assessed in terms of its heritage impact (and other factors) with NDHA such as Walk Barn being more affected. However, such an alternative would remove the harm from the main focus of heritage assets centred on Farnham Hall and the related landscape setting of this.



# 12 Conclusions

12.1 This statement has been prepared independently for the Third Parties objecting to the proposals. An assessment of the heritage assets has been undertaken including walking the footpaths and roadways which pass near to the application site. This has included identifying the designated assets and a non-designated asset and evaluating their heritage value and significance.

12.2 The proposals have been assessed in terms of the impact on the setting of the identified heritage assets. This has included not just a visual assessment but takes into account other impacts which can contribute to the setting and appreciation of the setting of the assets.

12.3 It is acknowledged and all parties are in agreement that a bypass will create significant beneficial effects for the designated heritage assets within the villages of Farnham and Stratford St Andrew which are currently along the route of the present A12. This report has concluded that the proposals will result in 'less than substantial harm' to the significance of the identified assets notably. The level of harm is held to be to the high end of this spectrum. The joint response of Suffolk Coastal and Suffolk County Council acknowledge the proposals will have a significant adverse effect on Farnham Hall and St Mary's church.

12.4 It is maintained that the collective experience of the proposed development would have a harmful and significant impact on the setting of a wider group of heritage assets along the line of the proposed EDF route of the bypass. The main impact will be on Grade II\* St Mary's church and the important group of historic buildings with Farnham Hall (Manor) as the listed focal building. It has also been identified that the new road would also have an adverse impact on NDHA such as Mollet's Farm and Walk and Pond Barns.

12.5 Insufficient weight and importance have been given in the EDF assessment of the proposed route to the potential harm to the setting and significance of the identified heritage assets and the harm to the historic landscape in which these buildings are sited and strongly inter-relate. It is maintained that the proposals fail to comply with the provisions of the statutory test (s.66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990) and the guidance of the NPPF.

12.6 EDF are therefore urged to reconsider the proposals in light of this submission which demonstrates there will be an unacceptable level of harm resulting to the identified heritage assets on the proposed route. On the basis of this assessment the proposed route should not





be accepted on the basis of the level of harm which would result to the identified heritage assets. An alternative route for the bypass should be sought which would result in less harm to the identified heritage assets. The Parish Council have suggested one alternative although this has not been developed in any detail. This would take the route away from the key heritage assets and historic landscape identified in this assessment and it is recommended that this be given serious consideration by the Examining Authority.



# References

- Hodskinson's **Map of Suffolk in 1783**  
Lark Press 2003
- Bettley J & Pevsner N **The Buildings of England Series – Suffolk – East**  
Yale University Press 2015
- Copinger **The Manors of Suffolk** – Vol 5 Notes on the History and Devolution – The Hundreds of Lothingland and Mutford, Plomesgate and Risbridge.  
Classic reprint 2018
- Suffolk CC Archaeology Service – **A12 Wickham Market to Saxmundham Improvement Stage 2 Assessment Report** 1994 (032)
- Editors Dymond D & Martin E **An Historical Atlas of Suffolk**  
Suffolk County Council Third Edition 1999
- Jennings A **The Old Rectory – The Story of the English Parsonage**  
Continuum International Publishing Group 2009
- Williamson T **England's Landscape – East Anglia**  
English Heritage 2006
- Hoppitt R **Deer parks of Suffolk 1086-1602**  
Suffolk Institute of Archaeology & History 2020



# Appendix 1

## List descriptions



# CHURCH OF ST MARY

## Overview

Heritage Category:

Listed Building

Grade:

II\*

List Entry Number:

1230211

Date first listed:

07-Dec-1966

Statutory Address:

CHURCH OF ST MARY, CHURCH ROAD

# Map



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([https://mapservices.HistoricEngland.org.uk/printwebservicehle/StatutoryPrint.svc/211881/HLE\\_A4L\\_Grade|HLE\\_A3L\\_Grade.p](https://mapservices.HistoricEngland.org.uk/printwebservicehle/StatutoryPrint.svc/211881/HLE_A4L_Grade|HLE_A3L_Grade.p)

The PDF will be generated from our live systems and may take a few minutes to download depending on how busy our servers are. We apologise for this delay.

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## Location

Statutory Address:

CHURCH OF ST MARY, CHURCH ROAD

The building or site itself may lie within the boundary of more than one authority.

County:

Suffolk

District:

East Suffolk (District Authority)



Parish:  
Farnham

National Grid Reference:  
TM 36252 59970

## Details

TM 35 NE FARNHAM CHURCH ROAD

4/36 Church of St. Mary 7.12.66

- II\*

Parish church. Nave, chancel, west tower. Mainly coursed flint with stone dressings, some repairs in red brick; brick tower; pantiled roofs to nave and chancel. 4 stage tower, late C15 or early C16, the upper stage with semi-circular headed bell chamber openings and crenellated parapet probably C19; diagonal buttresses to west face; good 2-light west window in brick. South nave wall with C12 slit window with deep splay, also a larger blocked C12 window (now partly obscured by a C19 buttress) and broad lancet window of early C14; 4 heavy sloping brick buttresses added in late C19 restoration when south doorway was blocked. North nave wall with a further C12 slit window and 2 renewed C15 windows; doorway within late C19 shallow timber porch with gabled roof; plain C12 arch to interior. C14 chancel: 2 broad lancets and Priest's doorway in south wall and good 2-light east window. Nave with C15 or C16 scissor-braced roof, moulded wallplate; chancel with common rafter roof with additional bracing to collars. Good set of early C19 box pews with original fittings; matching pulpit; modern font in C13 style. 2 traceried panels of the rood screen are mounted on the west wall of the nave. Original stairs to rood loft in north nave wall; holy water stoup in south nave wall (by former doorway), piscina with moulded segmental-arched head in south sanctuary wall. Graded II\* for surviving medieval work and for interior fittings.

Listing NGR: TM3625259970

## Legacy

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Legacy System number:  
405078

Legacy System:  
LBS

## Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing

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# Farnham Manor

## Overview

Heritage Category:

Listed Building

Grade:

II

List Entry Number:

1230210

Date first listed:

25-Oct-1951

Date of most recent amendment:

21-Sep-1983

Statutory Address:

Farnham Manor, Farnham

## Map



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This copy shows the entry on 04-Mar-2021 at 12:42:15.

## Location

Statutory Address:

Farnham Manor, Farnham

The building or site itself may lie within the boundary of more than one authority.

County:

Suffolk

District:

East Suffolk (District Authority)

Parish:

Farnham

National Grid Reference:

TM3654759856

## Details

TM 35 NE 4/34

FARNHAM Farnham Manor

(formerly listed as Farnham Hall)

25.10.51

II House. Dated 1602 on plasterwork between two original first floor windows on main front. Timber framed and plastered, brick gable end to south; plaintile roof. Two storeys and attic. Windows mostly C20 two-light and three-light mullioned casements with square leaded panes; main front with three original ovolo-moulded mullion windows. Asymmetrical doorway (probably brought from elsewhere) set within C20 reproduction half timbered and plaintiled porch incorporating a window to the right hand side; paired panelled and boarded doors under four-centre arch, carved spandrels. One internal stack with moulded base and blank panel; massive external stack to north-east corner (original flues removed), gable end stack to south. To the east and north are C20 rendered brick extensions.

Interior with imported C17 panelling, C18 oak staircase.

Large brick wing to east of house added in 1920s; not of special architectural interest.

Listing NGR: TM3654759856

## Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number:

405076

Legacy System:

LBS

## Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing







# HILL FARMHOUSE

## Overview

Heritage Category:

Listed Building

Grade:

II

List Entry Number:

1278707

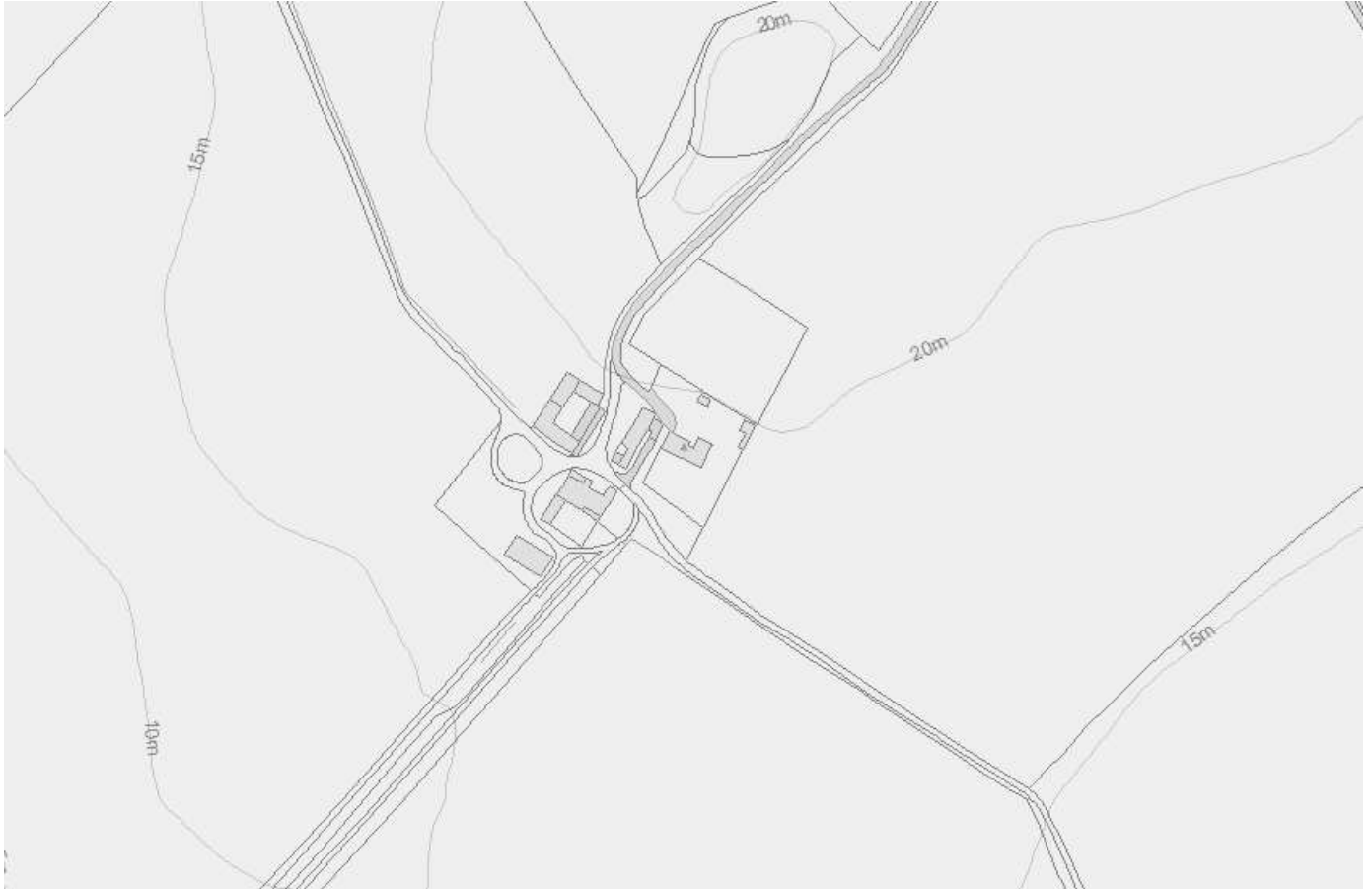
Date first listed:

21-Sep-1983

Statutory Address:

HILL FARMHOUSE

# Map



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## Location

Statutory Address:  
HILL FARMHOUSE

The building or site itself may lie within the boundary of more than one authority.

County:  
Suffolk

District:  
East Suffolk (District Authority)

Parish:

Farnham

National Grid Reference:

TM 36452 58999

## Details

TM 35 NE FARNHAM 4/35 Hill Farmhouse -

- II

Farmhouse. Main range late C16; east wing early C19. L shape plan. West wing: timber framed and plastered, originally in panels (one panel remains), brick end gables, plaintiled roof; 2 storeys and attic; 3 window range, sashes with glazing bars in flush frames; asymmetrical doorway with modern door. Good internal stack with moulded brick base and attached diagonal flues with moulded tops; further gable end stack to east. East wing: brick, plaintiled roof; modern casement windows, corbelled eaves, tumbled brickwork to gable end.

Listing NGR: TM3645258999

## Legacy

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Legacy System number:

405077

Legacy System:

LBS

## Legal

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End of official listing

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# ROSE HILL HOUSE

## Overview

Heritage Category:

Listed Building

Grade:

II

List Entry Number:

1230212

Date first listed:

25-Oct-1951

Statutory Address:

ROSE HILL HOUSE, FRIDAY STREET



# Map



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## Location

Statutory Address:

ROSE HILL HOUSE, FRIDAY STREET

The building or site itself may lie within the boundary of more than one authority.

County:

Suffolk

District:

East Suffolk (District Authority)

Parish:

Farnham

National Grid Reference:

TM3779160058

## Details

TM 36 SE FARNHAM FRIDAY STREET

2/37 Rose Hill House 25.10.51

- II

" F 1819" House. Dated T + E on tablet over doorway, standing for Thomas and Elizabeth Fuller. Red brick with white brick front; slated roof. 2 storeys plus basement. 3 window range, the centre bay set forward slightly; sash windows with glazing bars in cased frames, flat brick arches; central doorway with 6-panel fielded door, elliptical fanlight with glazing bars. A short flight of steps leads up to the door, with wrought iron railings to each side. Hipped roof with wide eaves. Wrought iron railings to road frontage. Attached to the east is the old house, with 2 wings at right angles; dated 1764 (or 1784) on gable end; red brick, pantiles to one wing and plaintiles to the other; 2.storeys; various casements, eaves brick dentil cornice.

Listing NGR: TM3779160058

## Legacy

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Legacy System number:

405079

Legacy System:

LBS

## Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.

End of official listing

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# Appendix 2

## Location of heritage assets



3

1. St Mary's Church
2. Farnham Hall (Manor) Complex
3. Hall Farm
4. Rose Hill House
5. The Old Vicarage
6. Pond Barn
7. Mollett's Farm
8. Walk Farm Barn



# Appendix 3

## Photos



Photo 1





*Photo 2*



*Photo 3*





*Photo 4*



*Photo 5*





*Photo 6*



*Photo 7*





*Photo 8*



*Photo 9*





*Photo 10*



*Photo 11*





*Photo 12*



*Photo 13*





*Photo 14*



*Photo 15*





*Photo 16*



*Photo 17*

