



Historic England

EAST OF ENGLAND OFFICE

Ms Ann Barnes  
Cambridgeshire County Council  
Box SH1315  
Shire Hall  
Castle Street  
Cambridge  
CB3 0AP

Direct Dial: 01223 582720

Our ref: P00753871

11 January 2018

Dear Ms Barnes

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

**LEVITT'S FIELD, WATERBEACH WASTE MANAGEMENT PARK, ELY ROAD,  
WATERBEACH, CAMBRIDGE, CB25 9PQ  
Application No. S/3372/17/CW**

Thank you for your letter of 22 December 2017 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

The proposed development concerns the construction of a new energy from waste facility which would affect the setting of Denny Abbey. This is a scheduled monument, with buildings also listed at Grade I, in the guardianship of English Heritage. The proposed plant at Levitt's Field would introduce a building of considerable mass and height into views to, from, and within, the scheduled monument. Historic England advise that the landscape setting of Denny Abbey contributes to its heritage values and that the proposed development would be a dominant and alien structure in key views from the site which would result in very serious harm to its significance.

The NPPF sets out the need to balance the economic, social and environmental roles of planning, attaching great weight to the conservation of irreplaceable designated heritage assets, requiring that any harm or loss should require clear and convincing justification. Historic England recognise that the site has been allocated in the local plan for uses which could include energy from waste, and that such facilities provide public benefits. However, in this case we advise that the harm which the proposed development would cause to the significance of Denny Abbey would be very serious and object to the development on heritage grounds. We urge that consideration should be given to alternative development on the allocated site which would not result in a high degree of harm to the significance of the designated heritage asset.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

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## Historic England Advice

The principal designated heritage asset which would be affected by the proposed development is the site of Denny Abbey. The site is in the guardianship of English Heritage and is managed on their behalf, for its archaeological and historical interest, by the Farmland Museum operating from the site.

We note that the construction of the proposed development would also have some impacts on the setting of other designated heritage assets, and would result in the destruction of undesignated buried archaeological remains. The significance, impact and mitigation of harm to the latter through prior archaeological investigation is set out in the ES. We do not comment further on these, other than to advise that the resulting harm should be weighed against public benefit of the scheme.

## The Significance of Denny Abbey

Denny Abbey originated as a mid-twelfth-century Benedictine abbey, but rapidly changed hands and was acquired by the Knights Templar for a hospital. After the Templars' suppression in the mid-fourteenth century, it became a Franciscan Nunnery of the Order of Poor Clares, who adapted the monastic and hospital buildings, building a new church and converting part of the C12 church for the residence of its founder, the Countess of Pembroke. After the dissolution this lodging became a farmhouse and many of the monastic buildings were demolished while others, such as the nuns' refectory and dormitory, were adapted for agricultural use.

The buildings which survive today are of particular interest. Standing remains of Templar preceptories are rare and Denny is the only example of an existing monastic site being adapted for Franciscan use. Furthermore, the surviving buildings form the only substantial architectural remains of the Order of St Clare to remain in the country. All the historic components are designated as a scheduled monument with the monastic buildings additionally listed at grade I and II\*. There are also a number of later agricultural buildings and structures relating to post-medieval and modern agricultural use. In addition to the extant and ruined buildings, there are extensive buried archaeological remains associated with the various phases of claustral layout, and extensive earthworks within the precinct, many of which are thought to relate to the servicing of religious community and its agricultural estate. The legibility of the remains and their landscape setting, together with the public appreciation and understanding of the monument which comes from its management as a visitor attraction, gives it very high national importance.

The historic setting of Denny Abbey is that of an important medieval institution, deliberately sited on the fen edge. Until the post-medieval draining of the fens, the Abbey was sited on a small island of raised, dry land on the fen edge, west of the River Cam and north of Waterbeach, connected by a short, raised causeway. Its



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remote and isolated location arose from the desire of monastic houses for separation from the world outside the cloister, coupled with the ability to manage their agricultural estates which sustained them economically.

This historic landscape setting is still legible in the character of the present day landscape, albeit modified. The micro topography of the site, the important link provided by the causeway and long open views over an open landscape can still be discerned in views to and from the abbey buildings, across the earthworks of the scheduled monument and from the causeway. The wider landscape setting continues to be predominantly open, largely surrounded by farmland. Although its character to the south and west has been modified in the twentieth century by the airfield and modern development flanking the west side of the A10 respectively, modern structures which would detract from this open landscape are absent or largely hidden in views from Denny Abbey. Although views west from the site have changed through development, the impact on the ability to appreciate its landscape setting has been very modest. Overall, the setting of the Abbey provides an experience which evokes the sense of seclusion and remoteness of this fen edge monastic site.

In terms of national importance, Denny Abbey exhibits survival of its various monastic layouts, good documentation, a diversity of buildings and use and association with related remains such as industrial/agricultural complexes and fishponds. Its significance lies in it being the only one of the three English houses of the Poor Clares to retain substantial architectural and archaeological remains. This is enhanced by a dynamic and complex evolution between the buildings of the different religious orders, and the intimate relationship between these monastic establishments and their landscape. This landscape setting is an important aspect of its significance, reflecting the importance which monastic houses placed on an isolated location to sustain the spiritual life, coupled with the need for an agricultural estate to sustain them physically and economically.

The designated heritage assets exhibit heritage values which include a high illustrative historical value (aiding our understanding of changing forms of medieval monastic life) while the architectural and archaeological remains and their landscape setting have a fortuitous aesthetic value. Given that the monastery was designed to be seen in the landscape as an isolated beacon of Christian devotion and practice, and the views from the monastery itself across the fen were also important, these views can be regarded as 'intentional' or 'designed' views. The contribution which the landscape setting of the Abbey makes to its significance also means that that it is highly sensitive to visual impacts from intrusive development. This increases the sensitivity of the setting of the site, and of views within that setting, to the impacts of unsympathetic development.

### **The Proposed Development and its Impact on the Setting of Denny Abbey**

An Energy from Waste facility is proposed on a site some 150 m from the scheduled



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monument, west of the A10, on land adjacent to the existing Waterbeach Waste Management Park (WWMP). This would comprise a conventional combustion plant based around a main building containing: a waste reception hall, waste bunker, boiler hall and demineralisation plant, turbine hall, flue gas treatment facility (FGT), air pollution control reagent silos and residue silos, education/visitor/ staff facilities, ancillary infrastructure and landscaping. The main building would be 141 m long, and varying in width between 55-91 m. The highest section of the plant, housing the boiler hall and FGT facility is located towards the western end of the building, and at its highest point would be 41.7m tall. The tipping hall which would form the lowest element would vary in height between 11.7-20.4 m. The stack, located adjacent to the western elevation, would be 4.5 m in diameter and 80 m high.

Historic England have been involved in pre-application discussions regarding the development. We recognise that the layout and design intent of the proposals have, in part, been developed in order to try to reduce the visual mass of the new building in views from the east, including views from Denny Abbey, *recognising the visual impact the scheme would have from Denny Abbey scheduled monument and farmland museum and the associated listed buildings and structures* (ES 4.2.17, 21.22-3, 27), while the associated landscaping scheme (4.2.30) is intended to reflect existing landscape character and characteristics of the fenland environment, including a belt of poplar trees to the east to soften the visual impact and screen lower elevations.

Although there have been a number of developments flanking the western side of the A10, principally the Cambridge Research Park and the Amey WWMP, buildings associated with these schemes are not materially evident in views from Denny Abbey; indeed, the form and location of Amey's existing plant has a negligible impact on views from Denny Abbey. In contrast, the proposed development would result in the introduction of a large, structure of uncompromising massing, with its 80 m high stack, of alien character and materials. This would predominate in views both from the extant monastic buildings and from within south/west views from western side of the monastic precinct. This juxtaposition would dramatically detract from the current views west of Denny Abbey, introducing an industrial character, not only arising from the plant buildings, but also from the chimney plume and from internal/external lighting. The effect would be to reduce the ability to experience what the current setting contributes to an understanding of the significance of Denny Abbey, as described above.

## Planning Policy

The National Planning Policy Framework (NPPF) sets out (para 7) government policy on the role of the planning process in achieving sustainable development; comprising three dimensions: economic, social and environmental roles. The conservation of heritage assets is one of the core planning principles of the Framework, which emphasises the importance of conserving heritage assets, in a manner appropriate to



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their significance ( para. 17), with conservation defined as the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances significance. It states in para. 131 that, in determining planning applications, local planning authorities should take account of 'the desirability of sustaining and enhancing the significance of heritage assets', the 'positive contribution that conservation of heritage assets can make to sustainable communities', and 'the desirability of new development making a positive contribution to local character and distinctiveness', and in para.137, that planning authorities should 'look for opportunities for new development ... within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably'.

Where the proposed development would have a negative impact on the significance of designated heritage assets, the Framework states (para. 132) that 'great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.' In conclusion, the NPPF (para 134) states that where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

Setting is defined in Annex 2 of the Framework as "the surroundings in which a heritage asset is experienced... elements of a setting may make a positive or negative contribution to the significance of an asset'. Historic England's *Historic Environment Good Practice Advice in Planning 3: The Setting of Heritage Assets* states that "the importance of setting lies in what it contributes to the significance of the heritage assets. This depends on a wide range of physical elements within, as well as perceptual and associational attributes pertaining to the heritage asset's surroundings". It goes on to say that "where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting , to accord with NPPF policies, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting" (para 9).

### Historic England Position

Historic England has considered the applicant's impact assessment and agrees with Chapter 5 of the ES (The Landscape and Visual Impact Assessment), which recognises that the proposed development *would generally be clearly visible on the western skyline, above existing vegetation and would be a prominent addition to the view. Visual effects would be significant (5.4.32) ... and within approximately 1km-1.5*



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*km of the site, the proposed development would be a large scale and prominent addition to the existing corridor of development...[and] would increase the influence of built development on local character (5.7.2) ...significant visual effects... would be experienced... at locations within the grounds of Denny Abbey (5.7.4).*

However, we find the applicant's approach to subsequent assessment of the setting of Denny Abbey, or the harm to its significance which these impacts would cause, unconvincing. As set out in Chapter 10 of the ES (Archaeology and Cultural Heritage), this appears to give primacy to an 'inner setting' which encompasses the relationships and views between designated heritage assets within the precinct, (10.4.3-7), whilst maintaining that these assets are less sensitive to change beyond the abbey precinct /boundary. In moving on to consider the landscape setting of the Abbey beyond the precinct, (10.4.8-11), the assessment distinguishes between *views to the fens to the north-east, east and south ( which would be highly sensitive to change)* and *the land to the west (10.4.9) [which] does not contribute to its cultural value or an understanding and appreciate (sic) of it,... it can be considered to be of medium sensitivity to changes to other elements and the wider landscape that do not contribute directly to the cultural value ( i.e. significance in NPPF terms) of the asset (10.4.11).* Given the contribution which the landscape setting of the monastic house gives to its significance, we do not consider that these distinctions are valid, and that the existence of unsympathetic development in the present setting to the west of the Abbey only serves to increase the sensitivity of the asset to further intrusion and harm.

The impact assessment (10.5.36-8) concludes that the development would *form a prominent feature in views from the western elevation of the abbey building and from the area of the earthworks west and south-west of the abbey buildings...while it would not obscure the relationship between the abbey and the earthworks in this direction, it would form a prominent feature and a distraction in this view. The magnitude of the impact is considered to be high [resulting] in a moderate level of effect. The proposes development would not impact upon those elements of setting which contribute most to the value (significance in NPPF terms) of Denny Abbey. Therefore, the impact (harm in NPPF terms) on the setting of the Abbey is considered to be less than substantial and the relevant policy tests should apply (10.6.5).* As stated above, we do not accept that views from the west of the Abbey are not amongst those which are key to an appreciation of its setting, and therefore there is no lessening of the contribution which they make its significance in NPPF terms. In this context we consider that the assessment of 'a moderate level of effect' which derives from the terminology of the technical analyses considerably underplays the level of harm which would be caused to the significance of the scheduled monument.

The HE Setting guidance (p 7) stresses that setting is a matter of qualitative and expert judgement and that technical analyses need to be supported by a narrative argument which sets out '*what matters and why*'. In our view, a previous, more





successful assessment of the Abbey's setting (10.4. 8) concludes that.... *despite the encroachment of development from the south and west, Denny Abbey still exists in an essentially rural landscape, detached from other settlements..... It is this present day landscape, with its links back to the medieval fen island, that contributes to the significance of Denny Abbey.*

Our assessment of the contribution which the land to the west of Denny Abbey makes to its setting has already been set out above, and we have referred to the importance which the HE Setting Guidance gives to the need to consider *where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting*, to accord with NPPF policies, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset.

Historic England advise that the relationship between Denny Abbey and its historic landscape is legible in its current landscape setting and that this makes an important contribution to its significance, and that the area to the west of the Abbey forms part of that setting. We consider the impact of the proposed development on the setting of Denny Abbey would be more than 'a prominent feature and a distraction in the view' from the west and south-west of the scheduled monument. The development would see the introduction of a very dominant large and alien structure into key views for the scheduled monument, would be highly intrusive, greatly detracting from its landscape setting, and resulting in very serious harm to the significance of the listed and scheduled designated heritage assets on the site.

The land is allocated by the Minerals Authority for waste recycling and recovery facilities, including energy from waste (SSPW1K). However, the allocation recognised the need to consider the setting of Denny Abbey in any proposals coming forward (in line with our comments on the proposed allocation on 26 March 2010). We note that the applicant has not considered any alternative sites for this facility on the grounds on the proposed development is a use which falls within the allocation and would be closely linked to existing uses on the WWMP site ( ES 3.1.2). We also note that there is significant capacity remaining in the existing mechanical biological treatment plant (ES 3.1.7).

The development would not bring any heritage benefits, and the development cannot be considered to be in accord with NPPF paras 131 and 137: it would not sustain and enhance the significance of the heritage asset, or make a positive contribution to local character and distinctiveness, or enhance or better reveal the significance of the monument, or preserve those elements of the setting that make a positive contribution to or better reveal the monument's significance.

Overall we consider that the development would cause very serious harm to the significance of the designated heritage assets at Denny Abbey. In NPPF terms this



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

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level of harm would be less than substantial. However, paragraph 132 states that any harm or loss, whether substantial or less than substantial, should require clear and convincing justification. We therefore believe your council should, in weighing whether the harm which would be fully justified and outweighed by demonstrable public benefits, consider whether the most appropriate and sustainable development of the site (in line with para 8 of the Framework) would be another use within the scope of the allocation, which would not erode the setting of the Denny Abbey and would be consistent with the conservation of its significance.

**Recommendation**

Given the severity of harm which would be caused to the significance of the designated heritage asset from the proposed development, Historic England advise that your council, in weighing the public benefits of the proposals against the serious harm to irreplaceable designated heritage assets, consider whether other potential uses identified in the allocation, which would not be harmful, should not be preferred, given that there is significant capacity remaining in the existing mechanical biological treatment plant and alternative sites for the proposed development have not been considered. Accordingly, Historic England objects to the proposed development on heritage grounds and recommend that the council takes these considerations into account when determining the application in line with national and local planning policy. If the development would not provide any wider public benefits that would convincingly outweigh this harm, as required by NPPF 132, then we recommend that the application should be refused.

Yours sincerely

**Deborah Priddy**

Inspector of Ancient Monuments

E-mail: [debbie.priddy@HistoricEngland.org.uk](mailto:debbie.priddy@HistoricEngland.org.uk)



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Ms Ann Barnes  
Cambridgeshire County Council  
Box SH1315  
Shire Hall  
Castle Street  
Cambridge  
CB3 0AP

Direct Dial: 01223 582720

Our ref: P00753871

14 May 2018

Dear Ms Barnes

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

**LEVITT'S FIELD, WATERBEACH WASTE MANAGEMENT PARK, ELY ROAD,  
WATERBEACH, CAMBRIDGE, CB25 9PQ  
Application No. S/3372/17/CW**

Thank you for your letter of 27 April 2018 regarding the additional information submitted in connection with the above application for planning permission.

We have considered the additional information supplied in relation to the landscape and visual assessment, and the proposals for planning requirements to condition draft materials samples and landscaping, so as to reduce the visual impact of the proposed development. Whilst we note that such a condition would be intended to mitigate the harm which the development would cause to the significance of Denny Abbey, a designated heritage asset, we do not consider that it would not materially reduce the level of harm, when considered against the aims and objectives of the NPPF, and our advice of the 11 January 2018 therefore remains unaltered.

Yours sincerely

**Deborah Priddy**  
Inspector of Ancient Monuments  
E-mail: [debbie.priddy@HistoricEngland.org.uk](mailto:debbie.priddy@HistoricEngland.org.uk)



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Ms Ann Barnes  
Cambridgeshire County Council  
Box SH1315  
Shire Hall  
Castle Street  
Cambridge  
CB3 0AP

Direct Dial: 01223 582720

Our ref: P00753871

29 May 2018

Dear Ms Barnes

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

**LEVITT'S FIELD, WATERBEACH WASTE MANAGEMENT PARK, ELY ROAD,  
WATERBEACH, CAMBRIDGE, CB25 9PQ  
Application No. S/3372/17/CW**

Thank you for your letter of 27 April 2018 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

**Historic England Advice**

Further to the conclusion of our letter of the 14 May, I should like to comment specifically on the Heritage Mitigation Package, contained within the Environmental Statement Volume 5: Additional Environmental Information.

We note that proposals include a number of measures which would enhance the visitor experience and the sustainability of Denny Abbey and the farmland Museum as a visitor attraction, as well as landscaping measures to reduce the visual impact of the proposed development. We consider that landscaping measures would have a limited ability to mitigate the visual impact of the development, given its proposed height, scale and massing. We recognise that the Mitigation Package has the potential to bring heritage benefits to the site in support of para 131 of the NPPF, which would help to address the concerns of The English Heritage Trust and the Farmland Museum regarding operational matters - the future management and sustainability of the site. However, whilst these measures are welcome, they would not offset the harm which would be caused to the significance of the scheduled monument from the impact of the development on the setting of Denny Abbey and, as stated in original response of the 11 January and supplementary letter of the 14 May.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749  
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## Recommendation

Historic England continues to object to the development on heritage grounds.

Yours sincerely

**Deborah Priddy**

Inspector of Ancient Monuments

E-mail: [debbie.priddy@HistoricEngland.org.uk](mailto:debbie.priddy@HistoricEngland.org.uk)

CC:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

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[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



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