



Historic England

**PLANNING ACT 2008 (AS AMENDED) – SECTION 89 AND THE  
INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010 (AS  
AMENDED) - RULE 8**

**APPLICATION BY MEDWORTH ENERGY LTD FOR AN ORDER GRANTING  
DEVELOPMENT CONSENT FOR THE PROPOSED MEDWORTH ENERGY FROM  
WASTE COMBINED HEAT AND POWER FACILITY**

**APPLICATION REF: EN010110**

**REPRESENTATIONS OF THE HISTORIC BUILDINGS AND MONUMENTS  
COMMISSION FOR ENGLAND (HISTORIC ENGLAND)**

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Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU  
Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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## Summary

Historic England's written representation considers in more detail the main concern we have already raised in relation to the impact of the Medworth Energy CHP facility on the significance of Wisbech Conservation Area through development within its setting.

In coming to this view we have taken into consideration specific historic environment visualisations chapter and the Historic Environment Chapter of the Environmental Statement. We have also put this position in relation to Planning Policy, and we recommend that in determining the application the examining authority should take into consideration the significance of the heritage assets and weigh the harm which would be caused to their significance against the public benefits of the proposed development. Consideration should be given as to whether the applicant has taken all possible steps to avoid the harm, or if this is not deemed possible by the examining authority, to minimise the harm the development would cause.

## 1. Introduction

- 1.1. The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, are the Government's adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology and historic landscape – and have a duty to promote public understanding and enjoyment. HBMCE are an executive Non-Departmental Public body sponsored by the Department for Digital Culture, Media and Sport (DCMS) and we answer to Parliament through the Secretary of State for Digital Culture, Media and Sport. Our remit in conservation matters intersects with the policy responsibilities of a number of other government departments – particularly the Ministry of Housing, Communities and Local Government, with their responsibilities for land use planning matters.
- 1.2 In previous correspondence in relation to this project and in our Section 56 Representation we noted that the applicants had provided a thorough and comprehensive Environmental Statement, the contents of which we are in broad agreement. However, we identified that this development had the potential to impact upon the historic environment to some degree. We also stated that specific points would be addressed in our full Written Representation in relation to Historic Environment sections of the Environmental Statement. This letter will therefore provide that additional detail in relation to the impact of the proposed development.
- 1.3 We have previously highlighted that whilst there are no designated heritage assets within the actual site, there are various heritage assets in relative proximity whose settings may be affected. Our records indicate that within 2km there are : 2



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conservation areas; 1 registered park and garden; 286 listed buildings and 2 scheduled monuments.

- 1.4 We do not wish to comment on grade II listed buildings or individual non designated heritage assets as these are outside the remit of Historic England. We are content to defer to the Local Planning Authorities and their conservation and archaeological advisors on those matters and we refer the examining authority to their submissions as relevant.

## 2. Comments in relation to Environmental Statement: Volumes 6.2, 6.3 and 6.4 Chapter 10 ; Environmental Statement Chapter 9,Landscape and Visual Impact figures 9.14-9.24 (Vol 3)

- 2.1. As discussed above, Historic England's concerns relate to the impact of the proposed CHP facility on the significance of the Wisbech Conservation Area.
- 2.2. The conservation area was designated in March 1971 and takes in the town's historic core – including, the medieval parish church, the C18 Brinks, former dockside area, the market place, and the later C19 development. Within the conservation area there are 221 listed buildings including 3 grade I, and 23 grade II\*. It also contains a grade II registered park and garden. The council's conservation area appraisal divides the conservation area into 5 character areas, and Historic England's particular interest concerns that which is referred to as Character Area No.1 -The Brinks which is the part of the conservation area that is nearest the development site.
- 2.3. **The Brinks** takes in the southern-most part of the town and conservation area including the North and South Brinks, extending westwards from the Town Bridge taking both the north and south sides of the river as it runs south-west and curves southwards towards the edge of the town and out into the fens. The area is characterised by its distinctive, high quality C18 and C19 townscape either side of the river which came about as the newly prosperous merchants and traders began using their wealth to transform the riverside into a fashionable quarter. Many of the buildings in the Brinks area are listed, including 2 at Grade I and 7 at Grade II\*, as well a Registered Park and Garden. Together they form an important and pleasing group which enhances the experience of the conservation area as one walks along either side of the river. Most of the views from within the Brinks area are close to mid-range views of the immediate townscape in the context of the riverside setting, but the longer, southerly views from the southern-most parts provide a greater sense of the edge of town hinterland and the low-lying Fenland countryside beyond, typifying the character of the wider setting of



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the conservation area at this point. Viewpoint 7(vol 6.3) of the LVIA demonstrates this.

- 2.4. The application site lies to the south of the town and is approximately 1 kilometre from the southern edge of the conservation area. It lies within an area that has been developed for industrial and commercial with numerous large warehouse type buildings which has eroded the former agricultural landscape from the mid C20 onwards. Whilst this modern development has compromised the historic character of the edge of the town and had a negative effect upon the wider setting of the conservation area, there is minimal inter-visibility between the conservation area and the application site. In general the heights of the buildings are such that they have minimal impact on views out from this part of the conservation area.
- 2.5. The proposed CHP facility comprises various components including admin block, workshops, central control room, tipping hall, waste and ash storage bunkers, turbine hall, maintenance buildings and associated electrical, water treatment and M & E infrastructure. We understand that the proposed structures would range in height from between 17 and 50 metres and the chimney would have a height to of 95 metres.
- 2.6. The proposed development would introduce additional bulky and tall structures within the wider setting of the Wisbech Conservation Area which are likely to be apparent in some long views from parts of the North Brinks area of the conservation area, as demonstrated in the visualisation provided (Viewpoint 7(vol 6.3 of the LVIA). The facility is shown appearing substantially taller above the existing rooftops and prominent in this particular view.
- 2.7. Whilst we appreciate that this may not be considered to be a key view that is intrinsic to the significance of the conservation area, we believe that the generally unimpacted views out, due to the prevailing lower roof line, makes some contribution to the way in which this particular part of it is experienced.
- 2.8. We therefore consider that the presence of the facility within the wider setting of the conservation area would, by virtue of its bulk and height, be readily visible in some southerly views out, and would have a somewhat negative effect upon the way this part of it is experienced and enjoyed.
- 2.9. It is also possible that the facility may be present in views from the upper storeys/roof areas of buildings within the conservation area which may affect the way in which they are experienced to some degree. In particular we wish to draw attention to no.15 South Brink (Formerly listed as Queen's School) which is listed grade II\* and lies approximately 1490 metres north of the application site. It is a



fine example of an C18 townhouse of high architectural quality. Of note is its fine Doric, pedimented doorcase, and domed cupola, and its distinctive presence within this historic townscape makes a positive contribution to the character and appearance of the conservation area.

- 2.10. We accept that the building's significance as a heritage asset lies largely in its architectural form and fabric and its historic relationship to its immediate setting. We also accept that its wider setting to the south, which includes the application site makes a lesser contribution to significance, particularly as its character has been negatively affected due to the modern industrial development as noted above.
- 2.11. However this building is somewhat unique in having a glazed octagonal cupola feature which is designed specifically for viewing/observation from an elevated position through 360 degrees. Therefore, as well as closer range views up and down the river and towards the town, it also allows for long views to be taken, including to the south. The quality of the views and that which is visible from the cupola does in our opinion, affect how this historic feature is experienced and appreciated.
- 2.12. The introduction of the tall and bulky structures of the CHP facility are likely to be visible in long views from the cupola. Whilst we accept that these views have already been compromised, we believe that it is somewhat regrettable that the existing negative effect on the visual experience would be compounded.

### 3. Policy context

- 3.1 In relation to Historic Environment Policy the National Planning Policy Framework requires 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, total loss or less than substantial harm to its significance, paragraph 199. It continues that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification, paragraph 200. The significance should be taken into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal, paragraph 195. Where a development proposal will 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, paragraph 202.

#### 4. Conclusion

- 4.1. We have provided detailed advice in our written representation about the scheme, the assessment and comments on the documents that have been submitted for examination.
- 4.2 We have some concerns in terms of the impact of the proposed CHP facility on the significance the designated heritage assets as described above.
- 4.3 In relation to these heritage assets, we have concluded that the development would result in harm to these designated heritage assets. We have, however, concluded this would be less than substantial in NPPF terms.
- 4.4 Therefore, in accordance with planning policy the harm would need to be weighed against the public benefits of the proposal. As stated in the NPPF any harm requires clear and convincing justification and we would want to be reassured that should the DCO be granted the balancing exercise has been undertaken and that the public benefit can clearly be demonstrated to outweigh this harm.

**Neville Doe**

**Assistant Inspector of Historic Buildings & Areas**



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