

# **Bentley Historic Core Conservation Area Public Consultation Submission**

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# **Contents**

<b>1.0</b>	<b>Introduction</b>	<b>1</b>
<b>2.0</b>	<b>Policy, Statue and Guidance</b>	<b>2</b>
<b>3.0</b>	<b>Review of the CAAMP</b>	<b>9</b>
<b>4.0</b>	<b>Conclusion</b>	<b>22</b>



## 1.0 Introduction

1.1 This report has been prepared on behalf of our client, D. E. Baker & Son, and on behalf of D. & D. Caldwell and J. Robinson & Son, in relation to the proposed Bentley Historic Core Conservation Area (BHCCA) and its Conservation Area Appraisal and Management Plan (CAAMP, November 2024). We have been asked by our client to provide a professional opinion on the proposed conservation area and its supporting documentation as part of this public consultation by Babergh District Council (BDC).

1.2 The BHCCA has been proposed by the Parish Council, with a heritage consultant, Handforth Heritage Ltd, being appointed to undertake a review of the potential for designation, and to subsequently produce the CAAMP. Icení Projects were instructed by BDC to carry out an external expert review (Icení Review, October 2024) of a previous version of the CAAMP. The Icení Review has been read and is referenced within this report.

1.3 Lichfields previously wrote to BDC on the 15<sup>th</sup> January with a holding objection and our initial concerns. The public consultation deadline was subsequently extended to Friday 21<sup>st</sup> February. Lichfields attended, alongside our client, the public meeting on the 16<sup>th</sup> January 2025, and this was a welcome opportunity to discuss these matters with council officers and with the author of the CAAMP.

1.4 The structure of this report is set out as follows:

- 1 **Introduction**
- 2 **Policy and Statute**
- 3 **Review of the CAAMP**
- 4 **Conclusions**

### **About the Authors**

1.5 This report has been produced by a team at Lichfields including Full Members of the Institute of Historic Building Conservation (IHBC) that has long-standing experience in the preparation and review of conservation area appraisals in both rural and urban areas:

- Michael Lowndes BA (Hon) MSc DipCons (AA) MRTPI.
- Felix Charteris BA (Hon) MA MA IHBC.

## 2.0 Policy, Statue and Guidance

- 2.1 The provisions for conservation area designation and management are set out in legislation. Government planning policy (as explained in the National Planning Policy Framework) and Government guidance (as described in the Planning Practice Guidance) provide further context.
- 2.2 The key provision, of which all else stems, is contained within Section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and this is set out in full below. This provision requires local planning authorities to determine which part of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and to designate these areas as conservation areas.
- 2.3 This provision introduces the fundamental consideration of ‘special architectural or historic interest’.
- 2.4 This is the key determinant for what can be considered possible to designate as a conservation area and must be considered a very high bar, relating the word ‘special’. The term ‘character or appearance’ specifies what qualities of a conservation area must then be considered desirable to preserve or enhance.
- 2.5 Some pertinent parts of the below statute and guidance have been underlined for emphasis of their relevance.

### **Conservation Area requirements under the Planning (Listed Buildings and Conservation Areas) Act 1990**

- 2.6 The following gives a summary of the main requirements set out within the 1990 Act:
- Every local planning authority
    - (a) shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance, and
    - (b) shall designate those areas as conservation areas (*section 69 [1]*).
  - It shall be the duty of a local planning authority from time to time to review the past exercise of functions under this section and to determine whether any parts or any further parts of their area should be designated as conservation areas; and, if they so determine, they shall designate those parts accordingly (*section 69 [2]*).
  - It shall be the duty of a local planning authority from time to time to formulate and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas.
  - Proposals under this section shall be submitted for consideration to a public meeting in the area to which they relate.
  - The local planning authority shall have regard to any views concerning the proposals expressed by persons attending the meeting (*section 71 [1, 2 or 3]*).

- In the exercise by local planning authorities of planning functions within the conservation area ‘special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area’ (*section 72 [1]*).

**NPPF (December 2024) policies on conservation areas include the following:**

- In designating conservation areas, local planning authorities should ensure that an area has sufficient special architectural or historic interest not to devalue the concept of conservation through the designation of areas that lack special interest (*paragraph 204*).
- Local planning authorities to look for opportunities for new development within conservation areas ‘to enhance or better reveal their significance’ (*paragraph 219*).
- ‘Not all elements of a Conservation Area ... will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area ..... should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the Conservation Area ..... as a whole’ (*paragraph 221*).

**Planning Practice Guidance (July 2019)**

- 1 ‘What do local planning authorities need to consider before designating new conservation areas?’
- 2.7 ‘Local planning authorities need to ensure that the area has sufficient special architectural or historic interest to justify its designation as a conservation area. Undertaking a conservation area appraisal may help a local planning authority to make this judgment.’ (*Paragraph: 024*).
- 1 Do local planning authorities need to review conservation areas?
- 2.8 ‘Local planning authorities must review their conservation areas from time to time (section 69(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990).’
- 2.9 ‘A conservation area appraisal can be used to help local planning authorities develop a management plan and plan-making bodies to develop appropriate policies for local and neighbourhood plans. A good appraisal will consider what features make a positive or negative contribution to the significance of the conservation area, thereby identifying opportunities for beneficial change or the need for planning protection’ (*Paragraph: 025*).

**Historic England Conservation Area Appraisal, Designation and Management Historic England Advice Note 1 (Second Edition, 2019)**

- 2.10 The purpose of this Historic England Advice Note is to provide information on conservation area appraisal, designation and management to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment legislation, the policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). Alternative approaches

may be equally acceptable, provided they are demonstrably compliant with legislation and national policy objectives.

- 2.11 They key provisions of this guidance relevant to this proposed designation are set out below:

### **1. Introduction**

- 2.12 “11. However, prior to appraisal, there is likely to be a stage when a decision would need to be taken as to the significance of an area and the likelihood of conservation area designation addressing relevant problems within the area. This is unlikely to be a lengthy process, the purpose being to consider whether an area has:

- 1 sufficient architectural or historic interest for the area to be considered ‘special’?
- 2 whether this is experienced through its character or appearance? and
- 3 whether it is desirable for that character or appearance to be preserved or enhanced, and what problems designation could help to solve.”

### **2. Identifying Potential Conservation Areas**

- 2.13 “15. The NPPF cautions local planning authorities to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest.”

- 2.14 “16. Having determined that an area may meet the definition in the Act, it is good practice to prepare a designation assessment to formally assess the special historic or architectural interest it may have and whether it is desirable to preserve or enhance its character or appearance. It is helpful to consider these as separate criteria (see paragraph 11 above).”

### **3. How to appraise conservation areas**

- 2.15 “23. Undertaking a visual survey of the conservation area is a fundamental part of understanding those elements of character or appearance that are desirable to preserve or enhance. An assessor will need to give consideration as to how they record their impressions of the area and how they determine what contributes positively to its character or appearance (and in particular how these features are connected with the area’s special interest) and what detracts from it or presents an opportunity for enhancement.”

- 2.16 “34. Conservation areas are designated for both special architectural and historic interest and most areas worthy of designation will have both, though the levels may vary, and one may be considered more important than another. The appraisal needs to set out these interests and express their importance clearly. Key elements in defining the special interest are likely to be:
- The still-visible effects/impact of the area’s historic development on its plan form, townscape, character and architectural style and social/ historic associations and the importance of that history.
  - Architectural quality and built form, including any particular architectural interest resulting from a past use, planning or design, important phases of development, the

integrity or group value of buildings or provision of a record of development over time through the architectural record.

- The contribution to the special interest made by the setting on the area, that is what the setting can contribute to the significance of a heritage asset, and how it can allow that significance to be appreciated (see Historic England Good Practice Advice 3: The Setting of Heritage Assets, 2nd edition).
- Local distinctiveness and a sense of place which make the area unique, including the influence of sources of building materials and historic industries that have come to contribute significantly to the area's present identity.
- How the places within it are experienced by the people who live and work there and visitors to the area (including both daily and seasonal variations if possible).
- The design, planting or past use of open spaces, green areas, parks and gardens, and trees, including the representation of particular species or varieties that reflect key periods of horticultural interest, collecting or design.
- Designated and other heritage assets, their intrinsic importance and the contribution they make to the townscape – this will normally provide an indication of past recognition of special interest, whilst a focus of assets of a similar type may suggest the area as a whole has a particular special interest.”

#### 4. Content of conservation area appraisals

##### The statement (or summary) of special interest

- 2.17 “39. This section of the document presents the most pertinent information to inform decision-makers and should, as far as possible, encapsulate what is different when considering proposals affecting the conservation area compared with anywhere else. It is the most important element of the document and will probably be the last part prepared, following completion of the analysis of the area's historic and architectural interest and character or appearance. Nevertheless presenting it at the opening of the document gives it prominence and ease of access. While it can stand alone as a guide for decision-makers, subsequent sections of the appraisal will add detail and explain the considerations that have informed its preparation.”
- 2.18 “After the recommendation of including a Statement of Special Interest at the front-end of the document, HE Guidance recommends the inclusion of the following sections:
- **Introduction** – background, community involvement, purpose, sources of information.
  - **Planning Policy Context** – national and policy framework, implications of the designation for community.
  - **General character, location and uses** – an overall baseline description of key features and context.
  - **Historic Interest** - the appraisal should focus on setting out what makes the area special and the impact of its history on its current character and appearance.

- **Architectural interest and built form** - set out the features of the area that contribute to its special architectural interest. This might start with a general statement regarding the nature of this interest, whether as a collection of buildings representing a range of uses that document the area's history, that represent the impact of a particular architectural vision for the area, as townscape or with materials and features that are special because of their contribution to local distinctiveness and identity.
- **Locally important buildings** – distinctive local detailing, doors, windows, roofs, trees. Recommendations for new local listings could form part of the appraisal,
- **Spatial Analysis** - Spatial character and plan form need to be described, eg whether the area follows a linear, compact, dense or dispersed pattern of settlement.
- **Streets and open space, parks and gardens, and trees** - This part of the appraisal describes open spaces within or immediately outside the conservation area, their enclosure, and their visual, and/or other sensory contribution to the character of the place. Trees, hedges, boundaries and street greenery are important elements of many conservation areas, not only in public places, but on private land as well. Identification of important single trees and groups and a description of their location and species, age and assessment of condition and potential lifespan can recognise their importance to the conservation area
- **Setting and views** - Heritage assets can gain significance from their relationship with their setting whilst views from within or outside an area form an important way in which its significance is experienced and appreciated. This part of the appraisal should identify how the landscape or townscape that the area is located within contributes to its special interest.
- **Character area and zones** – description of discernible character areas or zones.
- **Audit of heritage assets**
- **Assessment of condition**
- **Identifying the boundary** - An important aspect of the appraisal (and review) process will be considering where the boundaries should be drawn (and whether the boundaries of an existing conservation area should be re-drawn). An explanation of why the boundary is drawn where it is (or extensions are suggested, in the case of existing conservation areas), and what is included and what is excluded, is helpful. The position of the conservation area boundary will, to a large degree, be informed by the considerations identified in paragraphs 75-76 (Finalising, reviewing and publicising the boundary). As spaces contribute to enclosure, as well as framing views of assets and defining settings, a unified approach is desirable to their management as well as suggesting that in almost all situations the conservation area boundary runs around rather than through a space or plot."

## 5. Designation

### Suitability for designation

- 2.19 "72. The different types of special architectural and historic interest which have led to designation include;

- areas with a high number of nationally or locally designated heritage assets and a variety of architectural styles and historic associations.
- those linked to a particular individual, industry, custom or pastime with a particular local interest.
- where an earlier, historically significant, layout is visible in the modern street pattern.
- where a particular style of architecture or traditional building materials predominate.
- areas designated because of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of Parks and Gardens of special historic interest.”

2.20 “73. Conservation area designation is not generally an appropriate means of protecting the wider landscape (agricultural use of land falls outside the planning framework and is not affected by designation as a conservation area) but it can protect open areas particularly where the character and appearance concerns historic fabric, to which the principal protection offered by conservation area designation relates.” (underlined for emphasis).

### **Finalising, reviewing and publicising the conservation area boundary**

2.21 “75. Before finalising the boundary it is worth considering whether the immediate setting also requires the additional controls that result from designation, or whether the setting is itself sufficiently protected by national policy or the policies in the Local Plan.”

### **Local Plan**

2.22 The local statutory development plan comprises the Babergh and Mid Suffolk Joint Local Plan Part 1 (November 2023). Relevant Policies within the Local Plan are:

- SP09 – Enhancement and Management of the Environment.
- LP15 - Environmental Protection and Conservation.
- LP19 - The Historic Environment.
- LP23 - Sustainable Construction and Design.
- LP24 - Design and Residential Amenity.

2.23 In addition to the Local Plan, the Bentley Neighbourhood Plan is a “community led planning framework for guiding the future development, regeneration, and conservation” of Bentley and was adopted in December 2022.

2.24 The following policies are relevant to this assessment:

- Policy BEN 11 – Heritage Assets Policy BEN 12 – Buildings of Local Significance.

2.25 The Council is legally obliged under the listed buildings Act to determine from time-to-time which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. In doing so it shall designate such areas as conservation areas.

2.26 The Local Plan is in accordance with the NPPF and statute.

## 3.0 Review of the CAAMP

- 3.1 Close adherence to Historic England's guidance is best practice and whilst this guidance does not offer a prescriptive structure or content for CAAMPs, Lichfields considers that much closer adherence to HE's suggested content in Section 4 of the guidance would significantly improve the CAAMP.
- 3.2 A general point on presentation and usability: whilst the CAAMP is well written and presented, it would benefit from paragraph numbers. This will allow it to be cross-referenced, and greatly aid its usability during planning applications, appeals, and in public enquiries.
- 3.3 Provided below is an in-depth review of the CAAMP as written and structured.

### 1. Introduction (*headings taken from the CAAMP*)

- 3.4 The first paragraph of the CAAMP describes the task of the author to provide a CAAMP for 'for an area of land that encompasses the historic core of the parish of Bentley and its surrounding fields, buildings and ancient woodland.' This is an early indication of where there needs to be more robust consideration of the conservation area boundary and what comprises the historic core, and what comprises its setting.
- 3.5 Whilst the introduction contains a summary of the special interest, this would be improved by including this under a sub-heading or different section to help users of the document.
- 3.6 The summary of the special interest states that the key features of the BHCCA are:
- the historic core centred around the grade II\* listed church;
  - open fields and manorial land;
  - dispersed farmsteads;
  - ancient woodland;
  - high quantum of highly graded manor houses and high-status houses, largely set in their historic settings;
  - modest railway interventions that have resulted in attractive publicly accessible routes, bridges and cottages.
- 3.7 This summary list of what is included within the conservation area boundary appears immediately at odds with the name of the conservation area: Bentley Historic Core. A fair reading of the name of the conservation area would suggest that it includes the historic core only. The CAAMP itself describes the historic core as centred around the Grade II\* church. This would suggest that BHCCA as proposed has been incorrectly named as it covers a significant amount of land, landscape features, woodland, and historic buildings, which do not comprise part of this historic core. There should be greater logical relationship between the boundary and the name, which suggests that one at least must be reviewed and changed.
- 3.8 The introduction confirms that the CAAMP has been written in accordance with the HE guidance. This appears to be largely true, aside from Section 6, which being a significant

part of the assessment, does not appear to be in accordance with the HE guidance or any particular methodology.

- 3.9 Towards the end of the introduction, the CAAMP states HE's guidance in relation to ensuring that an area justifies designation because of its special architectural or historic interest, so that the concept or conservation is not devalued. The CAAMP then includes a short paragraph here which appears to justify the extensive boundaries of the BHCCA:

*'The well-preserved medieval structures and field patterns are important landscape features which form a fundamental part of the character and appearance of the area. The area retains unique, quiet, intimate, small-scale rural qualities, characterised by fields, many of which are accessible via public footpaths/bridleways and often bounded by tall hedgerows and mature trees.'* (page 4).

- 3.10 This paragraph and argument would be better presented alongside a full justification of the BHCA boundary included within Section 3 Spatial Extent. Alone, this paragraph is not a proper consideration of the appropriateness of the conservation area boundaries and directly contradicts Historic England guidance that 'Conservation area designation is not generally an appropriate means of protecting the wider landscape (agricultural use of land falls outside the planning framework and is not affected by designation as a conservation area) but it can protect open areas particularly where the character and appearance concerns historic fabric, to which the principal protection offered by conservation area designation relates.'

- 3.11 This guidance is clear that it is not appropriate to designate the wider landscape as a conservation area with agricultural land being particularly unsuitable in this regard. It is clear that open space can be included but only when this relates to historic fabric and the built environment (as set out in HE Guidance 73).

- 3.12 The justification for the extensive boundary as set out in the above paragraph, and the approach of the CAAMP generally, has confused the relationship between buildings and open spaces which are of special interest, and surrounding land which is not of special interest in and of itself, but which may enhance and contribute to the special interest of adjacent land. There is a clear distinction here, and this distinction is important in understanding what buildings and land should be included within a conservation area boundary, and what should be described as positively contributing to its setting.

- 3.13 The paragraph describes many rural and landscape features common across the English countryside: historic field patterns, intimate rural qualities, public footpaths, tall hedgerows, and mature trees. These are landscape characteristics which would not be considered as of special architectural or historic interest, as they are of landscape value rather than being considered against values which are concerned with the built environment. They do, however, contribute positively to those areas of special architectural and historic interest which are the historic built environment.

- 3.14 The paragraph within the introduction sets out that these characteristics 'form a fundamental part of the character and appearance of the area'. The use of 'character and appearance' here relates to the provision of s69(1) which defines CAs as 'areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance'. The definition of a CA comprises two components. First, it must be

established whether the area is of special architectural or historic interest. Secondly, it can then be defined as to what this character or appearance may be. This paragraph appears to confuse the two. Whilst these landscape features may have a character and appearance which has positive qualities, they would need to be established as being of special interest, rather than just landscape interest, first.

### **3. General Character and Spatial Extent (CAAMP)**

- 3.15 It would be useful if this section was separated into two parts: one describing the General character, location, and uses as per the HE guidance; and one which establishes the boundary of the conservation area. In the current document this split happens naturally after the fifth paragraph.
- 3.16 However, this second part focuses on technical boundary setting whereas it should focus on establishing the extent of special interest.
- 3.17 The assertion that ‘the appearance and character of the area is remarkably intact since the medieval period, with only small changes being found in the enlargement of agricultural fields as a result of the Enclosure movement,’ should be reconsidered. With the railway line, the adjacent A12 highway, modern farm buildings and farming methods, modern petrol station, and overhead telephone cables, the area cannot be considered to be intact. Most historic buildings within the area will date, or in part date, from the post-medieval period. Many unlisted buildings have clearly visible modernisation.
- 3.18 The CAAMP describes the boundary choice as:
- ‘In terms of the chosen boundary itself, this is largely based on historic landholdings of the Tollemache family and/or natural and manmade boundaries. In summary, the northern part of the area follows the parish boundary, a considerable portion of which is dominated by Brockley Wood and Old Hall Wood, both originally Tollemache holdings. Although Old Hall Wood is contiguous with Baldrough’s Wood and Howe Wood (to the north), the latter were historically part of the Belstead Hall Estate and not owned by the Tollemaches. These woods were later bought in 1956 by the owner of Old Hall Wood and Newcombe Wood, John Sadd and Sons, and came under the same ownership and management regime then. These woods are also outside the parish boundary providing further justification for their exclusion from the proposed conservation area.’*
- 3.19 This method for establishing the boundary of the CA appears to significantly deviate from best practice. The CAAMP should ensure that the boundary pertains to those areas which comprise of special architectural and historic interest. So, a starting point for establishing the boundary must be to understand this special interest. The above approach uses historic landholdings of the local landowning Tollemache family, and a mixture of natural and manmade boundaries. The rest of this paragraph explains how the boundary is based on including woods which were owned or not owned by the Tollemache family. As elsewhere established, most of these woods are Ancient Woodland with areas of Ancient Replanted Woodland, and some Semi-natural woodland. These are natural landscape features, identified as of significance due to the likelihood of their historic lack of human intervention. Whilst the CAAMP identifies these as having association with the Tollemache family, this is through historic ownership only and not in how they relate to the historic built environment related to the Tollemache family. This is further explored in Section 4.

- 3.20 Much of this ancient woodland, which falls in a curve around the west and north of the area, has a very limited relationship with the historic built environment. Figure 3.1 below shows the location of this woodland, much of which is included within the CAAMP boundary due to historic ownership. This map can be cross-referenced with Figure 3.2 which shows the location of the main above-ground historic buildings. This indicates there are very few buildings close to these woods and that the woods are a considerable distance from the historic core. Whilst they form part of the built historic core's wider setting, they do not have a strong visual or associative relationship with most of that built heritage. Due to this limited connection between the woods and the built environment, these woods are not of special architectural or historic significance, but may be considered part of the wider setting of some heritage assets, and therefore should be excluded from the CA.
- 3.21 However, this CAAMP expressly includes large areas of ancient woodland within the CA boundary, this approach is confirmed within the CAAMP: 'The boundary of the proposed conservation area then heads northwest along ancient tree lined Pond Hall Lane to include more of the historic Tollemache holdings, before looping west to incorporate numerous ancient woodlands such as Tare Grove and Pedlars Grove'. It is clear that the opposite approach must be taken to ensure that the concept of conservation is not devalued through the designation of areas that lack special interest. The difference between an area which is of special interest, and the surrounding area which comprises its setting, must be re-iterated here. These ancient woodlands are protected as landscape features and would not benefit from protection which is designed to protect the historic built environment.
- 3.22 The importance of understanding the separation between setting which contributes to special interest, and to land which is off special interest itself described by McCullough J in Halford:
- "...there must be a limit. It cannot be that any land from which one can see something of special architectural or historic interest may for that reason alone properly be included in a conservation area. That first sight of Lincoln Minster standing in the far distance never fails to excite. Ely across the fen miles before one reaches the city is incomparable. Both experiences are architectural; both are special; yet one could hardly put a ring five miles around each cathedral and designate it as a conservation area"<sup>1</sup>.*
- 3.23 This expressly addresses the fact that not all positively contributing setting should be part of the conservation area designation. In the case of this proposed CA, the majority of the land within the area is included on the basis that it is land from which the special interest of other heritage assets can be appreciated – rather than because it is of special interest in its own right. That amounts to a clear misinterpretation of the statutory criteria (read together with the associated guidance).
- 3.24 The last three paragraphs of this section of the CAAMP explain how the boundary has been drawn and confirm the adopted approach is largely so to include either the parish boundary lines, or to include historic Tollemache landholdings.
- 3.25 Whilst the Iceni Review considers the approach to the boundary to be justifiable:

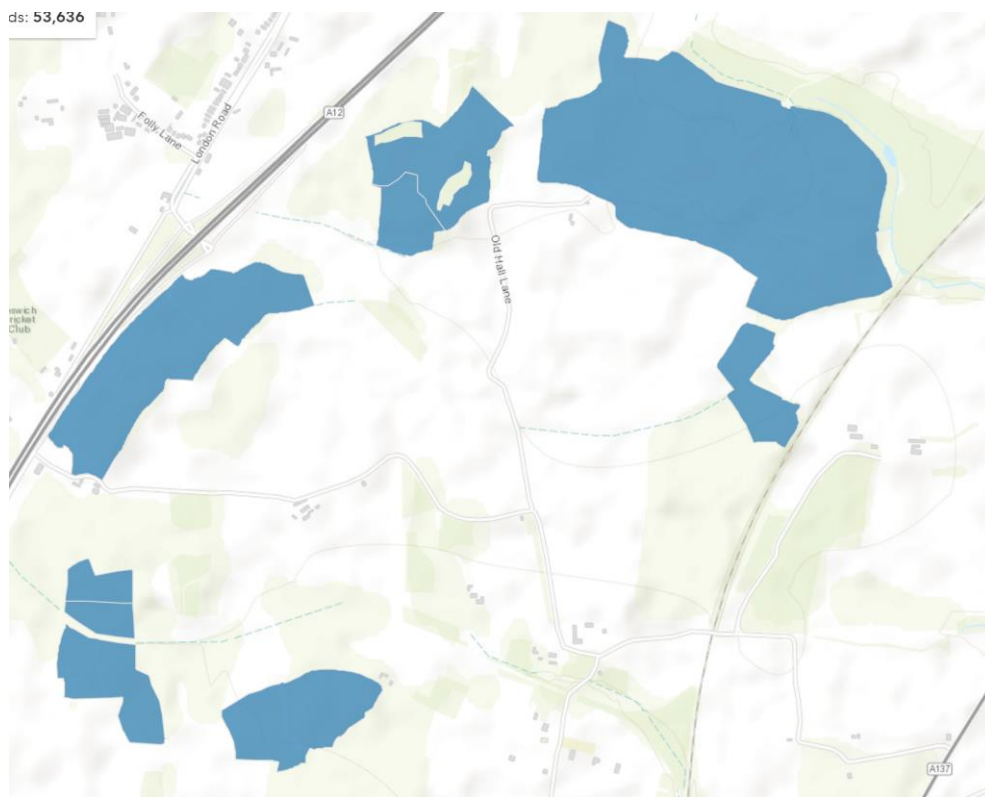
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<sup>1</sup> R. v Canterbury City Council, ex parte Halford [1992] 2 PLR 137

*‘Justification for the Conservation Area Boundary: The original smaller boundary was expanded to incorporate ancient woodlands, scattered farmsteads, and historic pathways. This larger boundary better reflects the area's historical landscape, in line with Historic England's guidance to avoid devaluing conservation areas by omitting important features. As above, we feel that this point could be further and more clearly elucidated, but as a whole, the Boundary appears generally robust. Where the boundary appears to follow that of the Parish, we would ask whether such an approach is necessary or sufficiently robust. We would encourage more detailed consideration of the northern border of the Area in particular.’*

- 3.26 Lichfields believes this boundary needs further critical assessment.
- 3.27 In particular, the sentence from the above passage: ‘This larger boundary better reflects the area's historical landscape, in line with Historic England's guidance to avoid devaluing conservation areas by omitting important features,’ conflates different elements of HE’s guidance.
- 3.28 HE does state that conservation can be devalued by the inclusion of areas that lack special interest, but not by the exclusion of important features. HE does state (paragraph 68) that ‘As spaces contribute to enclosure, as well as framing views of assets and defining settings, a unified approach is desirable to their management as well as suggesting that in almost all situations the conservation area boundary runs around rather than through a space or plot.’
- 3.29 This, when read in conjunction with the guidance document as a whole, must relate to the importance of including the immediate setting of heritage assets such as streets, gardens, village greens, or designed landscapes which relate to the built environment, but does not suggest that large tracts of ancient woodland and agricultural fields should be included.
- 3.30 For these reasons we disagree with Icení’s positive assessment of the inclusion of the area’s historic landscape, and that conversely, this is expressly contradictory to best practice and to a clear understanding of the statutory context.

Figure 3.1 Map showing the location of Ancient Woodland, Ancient Replanted Woodland, and Semi-natural woodland.



Source: <https://naturalengland-defra.opendata.arcgis.com/datasets/Defra::ancient-woodland-england/explore?location=52.010359%2C1.083923%2C14.87>

Figure 3.2 Excerpt from the CAAMP which shows the dates of key 19<sup>th</sup>-century or older historic buildings.

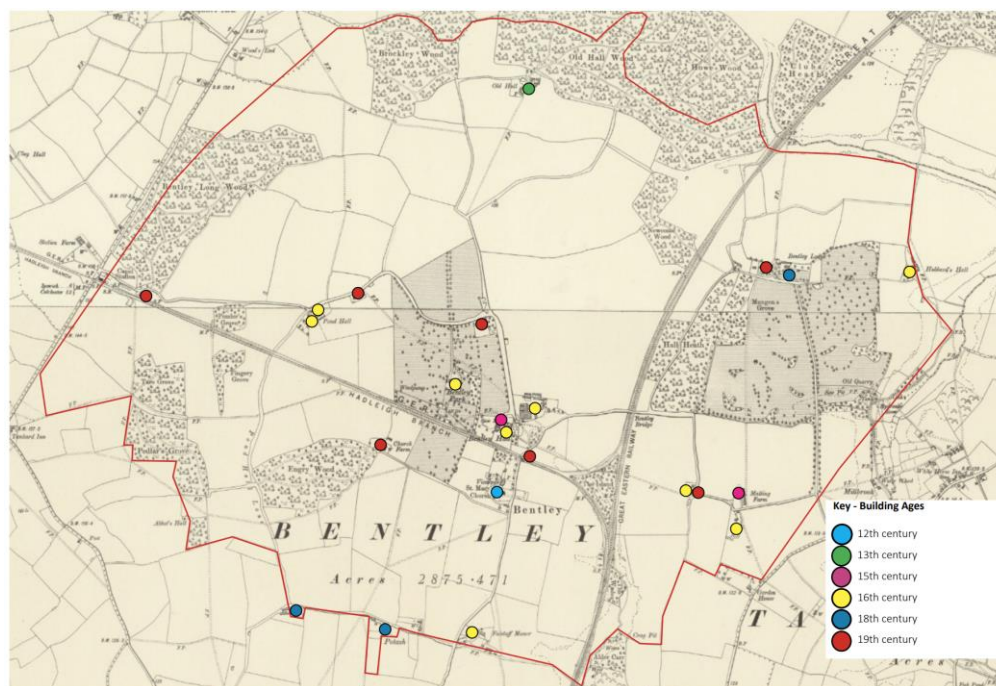


Figure 8 1881 OS map, showing number of surviving buildings within the proposed conservation area that are Victorian or earlier. These dates are based on recorded information. Where this is not available, on site external inspections or cartographic research has informed the date.

Source: CAAMP

#### 4. Origins and Evolution (CAAMP)

- 3.31 This section of the CAAMP establishes the history and evolution of the area, with a focus on establishing the historic association of the area with the Tollemache family. The CAAMP sets out the connection between the area and the Tollemache as:
- ‘By the end of the Middle Ages, the majority of the parish was in the hands of four landowners, the Tollemaches to the north, Fastolfs to the east, Priory of the Holy Trinity, Ipswich to the west and St Mary Dodnash Priory to the south. By the 16th century however, all four estates fell under the ownership of the Tollemache family thanks to the Dissolution and their close Royal connections. It is around this time that a number of new structures were built in the area, many of which survive today, dating to the late medieval and early post-medieval periods, including the grade II\* listed Bentley Hall, Meeting Hall (grade II\*) and Bentley Hall Barn (grade I).’*
- 3.32 The CAAMP succeeds in generally setting out the history of the area, and in particular the family history of the Tollemache and Gosnolds, as well as setting out a good description of the morphology of the area. The CAAMP pays close attention to the ancient woodland field patterns, and date periods of the primary historic buildings but there is little justification or elaboration as to why the Tollemache ownership or association of the wider landscape of fields and woodlands is of particular historic interest. Whilst it is clear that there are some significant Grade II\* and Grade I buildings which date from a time of their ownership, it is these buildings which are of significance, and their association with the Tollemache family may have historical associations of interest. There does not appear to be further evidence as to why the extensive surrounding landholdings are of particular interest due to their ownership by the family. It should be noted here that the English countryside was historically, and often contemporarily, dominated by significant family landholdings surrounding historic villages, churches and country houses. The extent of these landholdings therefore, whilst of local interest, would not in and of itself be of special interest.
- 3.33 The Icení Review describes the above approach as ‘its [the CAAMP] tying together of historic manorial holdings, and the role of the Tollemache family as something of a ‘golden thread’ that ties the whole Area together in a cohesive manner ensures that the overall extent of designation appears coherent’.
- 3.34 The characterisation of the Tollemache connection being a ‘golden thread’ is helpful in understanding how the BHCCA boundary has been drawn, but also exposes the fundamental flaws in how the CAAMP has established special interest. If the historic association with the Tollemache family is the key element of special interest, then the CAAMP fails to firstly establish why the Tollemache family themselves are of such historic note, and secondly to establish why their historic landholdings within the area are of such special historic interest. As set out above, familial landholdings of extensive country estates was entirely commonplace across the country and does not appear to be of special interest.
- 3.35 HE Guidance is clear that mere historic association or connection is not sufficient to demonstrate a special historic interest. As it is put at [HE paragraph 27], it is relevant instead to ask whether the areas has “a particularly notable, distinctive or unique historic association or connection for which it is well known and that has influenced its character or appearance?”.

- 3.36 The Tollemache family began the construction of their current family seat, Helmingham Hall, in 1480, and have long since sold their land at Bentley. The fact that Bentley and its various manorial landholdings began under different landownership, and then returned after being briefly united in ownership by the Tollemaches to being under separate ownership, greatly reduces the historic association of the area with the Tollemaches. This is because instead of the historic morphology of the area being associated with only one family, this area is associated with many. This complicated history also means that it is difficult to read or see how the connection between the Tollemaches and the area has manifested itself in the landscape or built environment of much of the area within the proposed BHCCA. There is a much clearer, and physically expressed, historic association with the Tollemaches and Helmingham Hall, than at Bentley.
- 3.37 It is also noted that the Tollemache family was funded, at least in part, by their ownership of plantations and over 800 slaves in Antigua. Given the reliance on the connection with the Tollemache family, it would seem pertinent for the appraisal to make clearer reference to these links with the family. This further historic context on the Tollemache family would have helped the CAAMP better establish where exactly historic interest in association with the Tollemache family may manifest itself in the local area.
- 3.38 In conclusion, Lichfields believes the historic interest of the Tollemache connection has been overstated. The historic ownership of the wider landholdings is of limited interest, and this is mostly related to the high grade listed buildings from these periods but is largely not readable across the wider landscape or built environment. The historic ownership of large areas of land is commonplace for historic land-owning families and should not be used as a 'golden thread' or justification for the overambitious boundaries of a conservation area. It must be re-iterated that special interest is the only criterion for inclusion, and this must be established. The wider setting can then help support the appreciation of this special interest but should not ordinarily be included within a conservation area.

### **Sections 5 and 6 (CAAMP)**

- 3.39 Sections 5 and 6 need reconsidering in order to help the reader and better structure the description of the conservation area. Section 5 is titled Features of Architectural and Historic Interest and focuses on individual buildings and sites which may be of architectural or historic interest. Section 6 is titled Assessment of Significance but focuses on a description of the area's character and appearance.
- 3.40 As Section 5 is more of an audit of individual buildings and sites, we suggest this should follow a more general description of the area. The contents of Section 6 would therefore be better placed within Section 5.
- 3.41 However, Section 6 appears to be confused with its purpose. The contents of this section reads as an assessment of the component parts of the CA's character and appearance, and to what extent certain aspects of the CA contribute positively, neutrally, or negatively to this character and appearance. The sub-categories of this section (Built Environment, Land usage, ancient woodlands, building materials, landscape and open spaces, key views, character areas, building types, setting) do not relate to an assessment of significance but more to character and appearance, which then supports the definition of the special interest of the area.

- 3.42 There is consistent mention of significance, but also much description of the component parts of the CA's character and appearance. There is little mention of whether this significance (or special interest) is architectural, historic, aesthetic, or archaeological. There is therefore no clear methodology here as to what significance is being assessed and how. We suggest the CAAMP is reconsidered in light of best practice to make the distinction between, and the appraisal of, significance/special interest and character and appearance, clearer. We would suggest that the contents of Sections 5 and 6 are swapped. Section 5 should then be re-titled to make it clear that it is an appraisal of the conservation area's character and appearance, relating to both architectural, historic, spatial, and landscape features. Section 6 would therefore relate to Architectural and Historic features, and their significance. Whilst there are multiple ways of setting out a CAAMP, we suggest that this is given careful scrutiny to ensure methodologies are robust and that description of character and appearance, special interest, and significance, is precise.

## 6. Assessment of Significance (CAAMP)

- 3.43 Notwithstanding the comments above relating to the assessment of Significance, the following are specific notes on the contents of Section 6:
- a **Introduction:** 'surviving buildings of historic and architectural interest which sit within a landscape characterised by historic farmland, ancient woodland and formal parkland'. This description encapsulates the fundamental issue with the extent of this CA, that the CA boundary includes what is best treated as the wider setting of those buildings which have special architectural and historic interest. This setting, which is not of special interest itself, should not be within the BHCCA boundary.
  - b **Built Environment:** There needs to be more description here of the genuine condition of the conservation area which contains multiple instances of buildings, some which have been modernised (with extensions and uPVC windows) and many instances of modern agricultural farming infrastructure. There should be mention of the detracting MOT garage, which considering its position at the edge of the conservation area, should not be within its boundaries.
  - c **Land Usage:** The conservation area is clearly not dominated by residential buildings, but by agricultural land and ancient woodland. Consider re-ordering this sentence.
  - d **The Ancient Woodlands:** This should be description and not a history. This historical review should be moved to Section 3. Furthermore, whilst these historic associations are of some interest, the CAAMP does not (and cannot) convincingly relate these Ancient Woodlands to the historic built environment of the BHCCA. These woodlands are primarily of landscape interest and support special interest as part of the wider, rather than being of special interest in their own right.
  - e **Traditional/Local Building Materials and Details:** 'Buildings within the Historic Core are constructed in materials which are regionally typical'. This line is confusing, is 'Historic Core' here referring to a smaller area within the BHCCA or to the whole area? This problem stems from the inappropriate name of the conservation area.

- f **Landscape and Open Spaces:** ‘Wide areas of open landscape form a significant feature of the conservation area. These fields and manorial grounds are reflective of historic land uses dating back to at least the medieval period.’ Fields are an entirely common aspect of England’s countryside, and their use is more often than not consistent with their use during the medieval period. It should be noted that whilst some houses and the church tower are visible across fields, this is often incidental and each of these houses and the church also have more intimate settings which comprise their curtilage, whether this be their churchyard, their gardens, or their more extensive parkland. Again, we return to the point that the fields and ancient woodland within the proposed CA have limited immediate association with the built environment and would be better considered as setting.

What is missing from this assessment, and from subsequent descriptions of the key views and the character areas, is a more homogenous description of the experience of the area. When entering the area, and going through it, visibility is often significantly constrained by roadside hedgerows. This is true of many roads throughout the area and particular of the built historic core around the church and Bentley Hall. This experience, which is predominantly of rural roads, PROWS, and occasional glimpses into either heavily screened, or occasionally open, private gardens, is the prevailing characteristic of the area. The CAAMP must be clearer that there is no settlement here with village or civic characteristics but a collection of privately owned and dispersed farmhouses and historic manorial holdings. There is often no visibility between key historic buildings within the area such as their dispersal. Whilst there is a small number of houses near to the church, these are predominantly screened from the road and do not provide any enclosure to the road.

- g **Key Views:** The assessment of views appears to be significantly overstated. HE guidance states: ‘Rather than seeking to identify each and every view that contributes to the area’s significance, it may be helpful to explain the types of views (such as views out to the setting, views of street frontages and groups of buildings or views of key landmarks) that are distinctive of the area’s character and contribute to its historic or architectural interest.’ The views as set out comprise 31 specific views which almost all appear to be incidental views entirely typical of the experience of the English countryside. Where these views relate to the listed buildings within this area, they are may or may not be of interest. Where many of these views relate more to open fields and to the ancient woodland, these are likely to be of very limited interest and not of special interest. The two plates of views at pages 29 and 30 of the CAAMP are indicative of the area’s fundamental issue. In much of these views the historic built environment is at a considerable distance in the far background, with significant areas of agricultural land and woods within the mid and foreground. This highlights the issue with the boundary and the need to more carefully consider the difference between areas of special interest, and their setting.

- h **Character Areas:** Whilst there is no specific requirement for character areas, that it is difficult to identify them within this area is yet another symptom of both the over-expansive boundary and the consistently disparate nature of the built environment within it. Most houses and buildings are set privately within their

own curtilage, often significantly screened from the public roads. Many can be glanced from various points around the area including along PROWs, but the character is very much of these buildings being separate entities with limited visual connections.

However, we believe there remains sufficient scope for character areas and this would aid understanding. This advice is notwithstanding our overall view that there is very little justification for the extensive boundary of the area, and on balance, limited to no justification for the BHCCA at all. There is scope to identify the following areas and their immediate setting: Ancient Woodland curve; Bentley Historic Core comprising church and Bentley Hall; Bentley Old Hall; Bentley Park; and Bentley Manor. This would help to separate what is a large area into manageable sub-divisions. Although as stated, we do believe these manors are set within such large areas of land, and to be so disparate in nature, that it is inappropriate to include them within a single conservation area.

- i **Setting:** This should consider the overall comments of this report and reconsider what is currently proposed to be inside the boundary but which would be better characterised as setting outside the boundary.
- j **Positive Neutral and Negative Features:** Multiple small, cropped, maps are difficult for the reader to follow.

## 8. Conclusion (CAAMP)

3.44 The proposed conclusion sets out:

*'This report has demonstrated that the proposed Bentley Historic Core Conservation Area is of great architectural and historic interest as a unique remnant of a rural landscape that dates back to the medieval period.'*

3.45 This description of the main source of special interest being that it is a 'unique remnant of a rural landscape that dates back to the medieval period' is both inconsistent with other references to the area's special interest, but also further evidence of the flawed proposals for the BHCCA. Conservation area designation is designed for the historic built environment, it is not appropriate for the protection of rural landscape.

3.46 The conclusion further sets out:

*'Several boundaries were considered for the conservation area before deciding upon the proposed extent. Initially a smaller area was considered but this failed to incorporate many of the ancient woods and historic and listed buildings that were scattered in the wider area. It is important to note that much historic parkland and agricultural fields have remained, as they were historically, since at least the Tudor period. They therefore provide a tangible, visible reminder of the historic setting and context of buildings within the proposed conservation area and are very much a part of their significance.'*

3.47 Whilst Lichfields does not question that aspects of this landscape may have survived since the Tudor period, woodland and fields remain unsuitable for conservation area designation. The contribution which they make to the significance of the heritage assets within the area, and as set out above, can and should be considered as part of the setting of the conservation

area. Exclusion from the conservation area boundary does not mean they do not contribute positively to the special interest of the area.

3.48 The CAAMP conclusion goes on to assess the designation of the area against HE's guidance and in particular:

- a sufficient architectural or historic interest for the area to be considered 'special'?
- b whether this is experienced through its character or appearance? and
- c whether it is desirable for that character or appearance to be preserved or enhanced, and what problems designation could help to solve.

3.49 Whilst much of whether the conservation area meets these criteria is discussed above, we have some key comments in relation to these concluding paragraphs.

3.50 The conclusion states that 'the area incorporates a virtually intact medieval landscape.' We would refute this and consider it to be an overstatement of the area's quality. Whilst there are indeed significant areas of Ancient Woodland, there have been many changes to the area and these include: enclosure of fields, new roads, two railway lines, multiple new dwellings, modern farm buildings, and the busy A12 highway, amongst others. Whilst the landscape is of some merit, and the woodland and many listed buildings are already protected, this is not a virtually intact medieval landscape.

3.51 The conclusion goes on to state 'The sheer quantum of highly graded listed buildings as outlined in appendix 1 reflects the 'special' nature of the historic and architectural interest of the area'. Whilst there are a number of listed buildings, and some of these at Grade II\* and Grade I, it must be recognised that many of these are disparate in nature with little intervisibility or, on occasion, association between them. Furthermore, significant areas of woodland and fields have very limited relationship with these listed buildings.

3.52 Importantly, the conclusion omits comment on HE's suggestion that the CAAMP should consider '**what problems designation could help solve,**' and this is a consideration which Lichfields believes has been lacking from both the council and their heritage advisors.

3.53 Our comments regarding this are set out below:

- The primary benefit of conservation area designation is the introduction of some additional controls over the way owners can alter or develop their properties as well as their permitted development rights. For this reason, conservation areas are most expedient where there is an historic area with a large number of unlisted buildings, which are vulnerable to unsympathetic change which would be damaging to the area's wider character. With this area, in which almost all houses are set within significant private gardens and more often than not have little visibility from the street, this additional control would have very little effect on the character and appearance of the area. All of the most important buildings within the area, and a considerable enough number to ensure the protection of the area's integrity, are already statutorily listed and so are controlled by a greater degree of protection than conservation area designation.
- The inclusion of a large number of fields which comprise agricultural land appears directly contradictory to HE guidance which states that: 'Conservation area designation is not generally an appropriate means of protecting the wider landscape (agricultural

use of land falls outside the planning framework and is not affected by designation as a conservation area).’ Furthermore, it does not appear that appropriate consideration has been given to the expediency of protecting vast areas of working farmland under a designation designed to protect areas of special architectural and historic significance. This designation, and the associated control over trees and the restriction of some permitted development rights, as well as the general increased scrutiny for each planning application may significantly hinder or discourage the working and future development of these farms.

- Conservation area designation brings in controls over works to trees. Due to the significant number of trees which would be within the designation, there does not appear to have been enough scrutiny of the appropriateness of this when considering development management resource. In addition, the Ancient Woodland, whilst not statutorily protected, is a planning consideration within the NPPF (para. 193) and so is already taken into account in relation to planning decisions.
- In light of the above, BDC, must also consider the area’s existing heritage protection. The area’s important buildings are all statutorily listed, and this means that their built fabric but also their setting, is a statutory consideration which BDC must give great weight to in the determination of planning applications. It is Lichfield’s view that the settings of some of these listed buildings are expansive and cover large areas of the proposed conservation area. Whilst this does not mean these areas are of special interest, they do contribute positively to the significance of the listed buildings. This applies to examples such as the Grade II\* Church of St Mary, whose tower is visible across neighbouring fields. Potential development within these fields is already assessed against these heritage considerations and conservation area designation would not materially change this. This also applies to open fields and ancient woodland surrounding Pond Hall (Grade II) and Old Hall (Grade II\*), where large expanses of the west and north of the conservation area would also already be considered part of the settings of statutorily listed heritage assets. This is not exhaustive, all listed buildings within the area have a setting, and this is considered within the planning system under the council’s statutory duty.

In light of these considerations, we do not believe the proposed conservation area would introduce meaningfully useful development management controls and would likely only increase the complexity of the development management process for residents and businesses for no gain.

## 4.0 Conclusion

- 4.1 In summary, Lichfields believes that the existing CAAMP and proposed boundary fundamentally deviate from best practice and that the boundary of the conservation area greatly over-extends that necessary or appropriate to protect the built historic core. Significant reconsideration needs to be given to better understanding the relationship between the historic core itself (identified as of special architectural and historic interest and inside the boundary), and its setting (outside of the boundary).
- 4.2 In addition to the above, and in reference to our consideration of the ‘what problems designation could help solve,’ we would question whether even a conservation area designation of only the historic core surrounding the church would be expedient.
- 4.3 As shown in the below Figure 4.1, many of the buildings within the historic core are listed and so the buildings and their settings are given great weight to their conservation. There is a modest number of houses within this area which are not listed. Conservation area designation would restrict works to these houses. However, there is extremely limited visibility across this area. Almost all houses and the church are significantly screened from the road and from other private curtilages. Alterations to individual properties here would be minimally appreciable from the wider area. The primary historic core is already protected by the Grade II\* listing of the church, and the Grade II\* and Grade I group at Bentley Hall. These are highly graded heritage assets and these designations mean their fabric and their settings within this historic core already have considerable heritage designation. We would therefore question whether any conservation area designation would be expedient, and whether it would solve any problems.

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Figure 4.1 Map of listed buildings within the Bentley historic core



Source: Historic England

4.4 Furthermore, we are advised that the current intention is for this conservation area to be adopted under delegated powers. Due to the significant size of the proposed area, and the associated public concern with its adherence to best practice, we request any decisions relating to this proposed conservation area be taken at committee level.

4.5 In summary, our concerns with the proposed conservation area and the CAAMP are:

- The name of the conservation area: Bentley Historic Core Conservation Area, appears to no longer be consistent with its boundaries which seem to include what is considered the historic core itself, and also significant areas of ancient woodland and agricultural land. In the document, this sometimes confuses whether reference is being made to the BHCCA or to the smaller historic core.
- Whilst it is commendable that BDC sought independent expert heritage advice to review the CAAMP, and whilst this was a professionally written document, Lichfields disagrees with its conclusions and does not consider that the review has robustly challenged the proposed designation or the CAAMP effectively, and as failed to identify clear deviations from best practice and from a proper understanding of the statutory basis. Whilst there will always be points of professional disagreement, it would have been more helpful for the council, and in the interests of ensuring the CAAMP is as robust as it can be, if Icen Projects had been more critical and questioning in their assessment.
- The wider expanse of land which is currently proposed to be included within the boundary of the conservation area should instead be considered as part of the conservation area's setting. Historic England guidance sets out that an appraisal should 'identify how the landscape or townscape that the area is located within contributes to its special interest, [...] such as between a village and its surrounding agricultural landscape'. Historic England note that nearby areas of recognised landscape character value such as Areas of Outstanding Natural Beauty (AONBs) or Areas of High Landscape Value, where penetrating or abutting the built-up area, should also be noted and explained. Again, the clear inference here is that these areas should not be, and do not need to be, included within the conservation area boundary (because they are not of special interest in their own right) and should be identified as part of its setting instead.
- The above guidance from Historic England, in terms of what should be considered as part of the setting of a conservation area, and what should or should not be considered part of the designation, very clearly suggests the designation of the rural setting of villages, which likely comprises extensive agricultural land, would lead to an inappropriate designation (HE, 73).
- The latter part of this advice (HE 73) makes clear that conservation area designation relates principally to historic fabric. The setting of heritage assets, including listed buildings and conservation areas, is a longstanding concept which allows for the protection of their significance when considering development which does not directly affect them. Historic England set out their own guidance in relation to setting in *The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3* (2nd Edition, 2015).
- The explicit inclusion of significant areas of Ancient Woodland and agricultural land is inconsistent with best practice and these areas have not been justifiably established to

be of special architectural and historic importance (and are included primarily for landscape value).

- The following significant agricultural landholdings within the proposed CA demonstrate the extent of agricultural land which has been included:
  - (i) Steward Trust Fund - 210 acres
  - (ii) D E Baker & Son – 390 acres
  - (iii) J Robinson & Son - 350 acres
  - (iv) D & D Caldwell - 25 acres
  - (v) These landholdings of only some, but not all, of the main landowners, demonstrate that at least circa 975 acres of farmland have been included within the conservation area and we estimate the above figures represent around 70% of the proposed total area. All of the above landowners are objecting to the conservation area designation.
- Expediency and whether the council have adequately considered whether designation solves any problems that are better or already addressed by other planning controls. As set out in detail above this relates to the following reasons:
  - (i) due to the existing listed buildings and their settings which have statutory protection, giving the area an already high degree of heritage protection, this protection is often at Grade II\*, and also at Grade I, giving these buildings and their settings generally greater protection than that associated with conservation areas due to their greater relative importance.
  - (ii) the dispersed and secluded nature of the non-listed buildings for which there would be limited development management advantage in the interests of preserving the overall character and appearance.
  - (iii) the extensive areas of Ancient Woodland which already has strong policy protection in the NPPF (paragraph 193(c))
  - (iv) Conversely, we believe that designating large areas of working farmland is more likely to have adverse effects and add complexity to the development management process, for no heritage gain.
- Lichfields believes the historic interest of the Tollemache connection has been overstated. The historic ownership is of some interest, and this is mostly related to the highly listed buildings from these periods but is largely not readable across the wider landscape or built environment, and is very unlikely to be considered 'special'. The historic ownership of large areas of land is commonplace for historic land-owning families and should not be used as a 'golden thread' or justification for the boundaries of a conservation area where this has little physical expression.

4.6 In summary, Lichfields believes that the existing CAAMP and proposed boundary fundamentally deviate from best practice and that the boundary of the conservation area greatly over-extends that necessary or appropriate to protect the built historic core. Significant reconsideration needs to be given to better understanding the relationship between the historic core itself (identified as of special architectural and historic interest and inside the boundary), and its setting (outside of the boundary).

- 4.7 Furthermore, we are advised that the current intention is for this conservation area to be adopted under delegated powers. Due to the significant size of the proposed area, and the associated public concern with its adherence to best practice, we request any decisions relating to this proposed conservation area be taken at committee level.





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