



Historic England

Ms Melanie Pieterman
East Suffolk Council
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Suffolk
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Direct Dial: 01223 582721

Our ref: P01085329

5 July 2019

Dear Ms Pieterman

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

**FORMER COUNCIL OFFICES, MELTON HILL, MELTON, WOODBRIDGE,
SUFFOLK, IP12 1AU
Application No. DC/19/2641/FUL**

Thank you for your letter of 4 July 2019 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

This application is a resubmission of a previous scheme for the development of 100 new dwellings plus a community centre, retail unit and car parking on land occupied by former District Council offices at the northern edge of the Woodbridge conservation area. We consider this could result in harm to the historic significance of the conservation area and potentially have a visual impact on views from the setting of the Sutton Hoo scheduled monument. The Council should consider an alternative scheme for redevelopment which reduces this harmful impact but as the application stands we would object to the granting of permission.

Historic England Advice

The earliest records of settlement in Woodbridge date from the mid-10th century when a Saxon settlement developed on the western side of the River Deben. The core of the medieval town around the market place with the parish church of St Mary and site of the priory to the south is joined by Church Street and New Road on the southern and eastern sides. These connect with The Thoroughfare, the main historic



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road running parallel with the river and part of the main route from Ipswich to Lowestoft. To the south of the Throughfare roads and property boundaries lead down to the riverside where an important boat building industry was established in the medieval period along with commercial quaysides and larger industries, such as canning and malting, which flourished in the 19th century. The Throughfare itself is, as the Conservation Area Appraisal states 'the commercial heart of the town with a continuous frontage of 18th and 19th century vernacular facades' to buildings of various dates, a large number of which are listed.

The junction with Lime Kiln Quay Road (a relief road built in the 1970s) marks a change in the character of the Throughfare. The road is wider, buildings more widely spaced, more often set behind front gardens and those on the western side often built higher than the road because of the rising ground level. Historic buildings along this stretch of road are generally residential and younger as they are further from the centre of the town. Early 19th century houses give way to Victorian and Edwardian ones, but they maintain a consistent character, both in the relationship with the street and in scale, form and materials.

The conservation area extends to Pytches Road where the Thoroughfare becomes Melton Hill. Melton Hill and the northern part of the Thoroughfare form a long, straight approach road to Woodbridge from the north which for pedestrians continues along the Thoroughfare into the heart of the historic town. This approach is an important part of the conservation area and the sequence of houses along it illustrates the development of the outer parts of the town in the 18th, 19th and early 20th centuries with a strong degree of consistency despite some modern infill building. An earlier building, the 17th or early 18th century Maltings Cottage stands perpendicular to the eastern side of the road just past Pytches Road, an example of earlier rural building which the town has grown out to. This building is listed at grade II.

The application site stands on the eastern side of Melton Hill adjacent to where the conservation area starts and it contains two existing buildings facing but set back from the road. One is a typical mid-Victorian villa (number 112 the Thoroughfare), the other the former offices of the Rural District Council (RDC) built in the early-20th century. The latter is constructed in red brick with a hipped roof in a style reflecting traditional English domestic building.

The Heritage Impact Assessment included with the previous application does not seem to have been revised but is still a useful document. It notes that the Council identified these buildings to be of local townscape interest and undesignated heritage assets (paragraph 4.22) and states that that number 112 'contributes positively to the street scene' while the former RDC office makes a 'positive contribution to the immediate locality because of its domestic scale and the quality of its materials and construction' (paragraphs 4.30 and 4.34). We would agree with this assessment which recognises that both buildings reflect the essential character of other 19th and early 20th century buildings on this part of the road including the Edwardian houses opposite (numbers 101-117). Because of this they are a part of the immediate setting of the conservation area which makes a positive contribution



to its historic significance by reinforcing the character of this part of the Thoroughfare.

The Heritage Impact Assessment also considers previous changes to the interior and exterior of the buildings. Despite these incremental changes the street front exteriors, which are the most important parts as they relate to the conservation area, are in essence still as built. The Assessment also comments on how the 'existing townscape of the SCDC site is...incoherent and detracts from the sense of place' (page 19). This comment relates to the modern SCDC offices behind the Victorian villa and former RDC building and the entrance way between them. These modern offices do not remove the positive contribution which these two undesignated heritage assets make. They not traditional, but are understated on the street front and while they do not make a positive contribution to the conservation area they are largely hidden behind the frontage buildings.

The proposed development would require demolition of both the historic buildings on the site as well as the modern Council offices behind and replace them with a series of multi-storey residential blocks set along a broad central pedestrian route through the site on an east-west axis. The western most roadside blocks would be set back from and at an angle to the street with taller buildings rising behind them. A mono-pitched roof form has been selected which increases the height of these blocks and gives them an increased sense of verticality. The site slopes down towards the river but despite this the tallest block – which Design and Access Statement gives a maximum height of 22 meters- would appear as a tall building from the street out of scale with any historic building which, as noted above, is mainly characterised by traditional domestic building. The former maltings north of the application site is referred to in the application documents but this not a relevant model for buildings addressing the Thoroughfare and the largest of the proposed new blocks exceed the maltings in scale and do not have the horizontal emphasis or characteristic fenestration of industrial malting floors.

The precise visual impact of the new buildings on views on Melton Hill and the Thoroughfare is difficult to assess as the new application does not seem to have provided any additional images to illustrate it from the details submitted it is clear that the new buildings would be hugely out of scale with the adjacent historic buildings, including the grade II listed Maltings Cottage and numbers 101-117 the Thoroughfare. They would also not be parallel with it, as is the predominant pattern of building. Furthermore, the blocks would constitute a dramatic departure from the character of the adjacent conservation area in form and detailing.

Turning to views of the proposed development from the east, we remain concerned about the visual impact of the new buildings on views from the eastern bank of the river and the high ground on the ridge where the Sutton Hoo burial site scheduled monument stands. Despite modern commercial building of some scale between the historic town and the river the roofscape is largely that of small red tiled pitched roofs. This reflects the grain and scale of traditional building over several centuries in central Woodbridge and is an important part of the character and historic interest of the conservation area.



The proposed development, by contrast, would consist of buildings some of which are larger than the traditional ones found in the town and with mono-pitched facing east giving combined appearance of a concentration of building not seen elsewhere in the townscape. The effect of this could be to draw the eye from the main part of the conservation area and give undue prominence to the new development which is actually a relatively small and outlying part of the town.

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (paragraph 66.1). Special attention shall also be paid to the desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of any powers under the planning Acts (paragraph 72).

The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to achieve sustainable development and that protection and enhancement of the historic environment is an overarching objective in this (paragraphs 7 and 8). The significance of listed buildings and conservation areas can be harmed or lost by development in their setting. The NPPF states that clear and convincing justification should be made for any such harm and that 'great weight' should be given to the conservation of listed buildings and conservation areas irrespective of the level of harm caused (paragraphs 193 and 194). Paragraph 200 also states that the Council should favour proposals for development which preserve those elements of setting that make a positive contribution to the heritage asset or better reveal its significance while paragraph 201 notes that 'loss of a building which makes a contribution to the significance of the conservation area...should be treated as harm' to that significance.

We have again considered the proposals on the basis of the information submitted and we are concerned that demolition of number 112 the Thoroughfare and the former RDC office building would result in harm to the significance of the conservation area by removing buildings in its immediate setting which make a positive contribution to it and which help illustrate an aspect of its historic significance. The form, layout, scale and design of proposed new building on the street would also be dramatically at odds with the strong historic character of the street, making the development an alien and intrusive presence on the edge of the conservation area. The appearance of the new development as a whole in views of the conservation area from the east would also be harmful because of the scale and form of the new building and has the potential to affect the experience of the Scheduled Sutton Hoo site.

The proposals would result in harm to the significance of the conservation area and not preserve those elements of setting that make a positive contribution to the heritage asset and better reveal its significance in terms of the NPPF, paragraphs 193, 196 and 200. As such it would not achieve the NPPF's overarching aim of promoting sustainable development. Furthermore, the Suffolk Coastal Local Plan



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(first draft, 2018, policy SCLP12.28) states that 'opportunities to enhance the historic environment [of Woodbridge]...will be supported ...which do not have a significant adverse impact on the environmental designations.' The application site has some potential for enhancing the conservation area but the current proposals would have as significant adverse impact on it and so do not accord to the Council's draft policy.

We consider that a more suitable scheme which would preserve and enhance the conservation area while delivering new residential development on the site could be produced. This would satisfy the Council's own policy as well as achieving the objective of the NPPF to deliver sustainable development. Retaining and reusing the historic buildings on the site would preserve a positive aspect of the conservation area's setting but not preclude the creation of new building on the site rear of the site. While the scale of new building toward the western side of the site behind the street front buildings would need to respect that of the street more effectively a contemporary design could be suitable. The scale, form and massing of the development as a whole would need to be careful consideration so it was more akin to the historic town which it abuts but this also need not preclude a high quality development. We would be happy to advise the Council on revisions to the proposals but would object strongly to the application as it stands and recommend it is refused.

Recommendation

Historic England strongly objects to the application on heritage grounds. Development of the application site would result in harm to significance of the conservation area and not constitute sustainable development in terms of the NPPF. We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 7, 8, 193, 194, 196, 200 and 2001. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely



David Eve



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