

Comments from Design and Conservation Officer

Liz – you have asked me to comment on the above application to replace the existing former Council buildings at Melton Hill, Melton with 100 units of residential development forming a mix of apartments, dwellings, community space, retail, parking and landscaping.

As you know I provided you with comments on design and heritage aspects of the scheme (dated 27th September 2017) that was originally submitted. That scheme was approved by the former SCDC planning committee but not consented before it was withdrawn by the applicant. A subsequent application for the same design but minus affordable housing was refused by SCDC and has now been appealed to the Planning Inspectorate (ref. APP/J3530/W/19/3227271). That appeal is currently under consideration and, in the meantime, the applicant has re-submitted a revised version of the original application that is here under consideration.

I have made the judgment that, in considering the current scheme, my previous comments are still very largely relevant. I have not changed my views about the merits and demerits of the application and have decided, therefore, to largely repeat these here which I do below. I have added to these comments to reflect the fact that the NPPF has been twice revised since the original application (latest update is of February 2019). This means that the section on design has partly been changed; and that the section on conserving and enhancing the historic environment has undergone changes in paragraph numbering. I note also that the National Planning Practice Guidance was updated on the 23rd July this year for the historic environment and I have taken this into account. All the other guidance and supporting documentation to which I refer in my 2017 comments remain extant and unrevised since I made my original comments.

Residential development (100 no. units) including 32 no. affordable housing units (Class C3) plus a community space (91 sq.m.) (Class D1) and a retail unit (157.7 sq.m.) (A1/A2/A3), car parking, means of access and landscaping, all following demolition of the buildings on the site - Former Council Offices, Melton Hill, Melton, Woodbridge, Suffolk IP12 1AU.

You have asked me to comment on the above full application to construct 100 residential units, a building in part community use and a retail unit on the site of the former Council offices on Melton Hill in Melton and Woodbridge (the site straddles the parish boundary).

1.0 Background

The application proposal is for the site of the former offices in which I had worked as the Senior Design and Conservation Officer since 2007 until the site was vacated towards the end of last year. On that basis, therefore, it is fair to say that I have a close knowledge of the site. I also have a broad understanding of the development issues arising in which I take a direct interest here, namely urban design and the conservation of heritage assets.

In respect of the current application, I was involved with you and colleagues at your request at pre-application stage from the 3rd May 2016, which involvement included fifteen meetings with the design team, consisting of the developer, his architects and, on occasions, his landscape architects. The architects' Minutes of these meetings are included in the submission. I also attended alone two meetings at the architects' offices in Ipswich. I also attended two meetings of the RIBA Suffolk Design Review Panel held in Ipswich at which the scheme was submitted for external design scrutiny. I have not had any involvement since the original committee decision to date with the scheme, applicant, agents, or the RIBA Suffolk Design Review Panel (which has not been engaged since).

The extent and level of pre-application engagement for this scheme reflects the highest importance that we place on creative design dialogue from the outset for sites of key sensitivity; and also reflects the willingness of the applicant and agent, here, to join that. It is important to stress, however, that such a level of engagement does not make me an advocate for the scheme, as this would be inappropriate. The design of the proposal at all times in the pre-application process was that of the applicant and his architects. My comments here are provided to you in the form of a critique such that I shall objectively assess the merits and demerits of this application.

Please note that I did not meet the heritage consultant for the proposal, Bob Kindred, as part of the pre-application process.

Please note that I did not have any input into the planning brief provided by SCDC for the purposes of marketing the site for sale.

As you know, I am a chartered architect, chartered town planner and have a postgraduate qualification in urban design alongside another qualification in landscape history and field archaeology. I am a Full Member of the Institute of Historic Building Conservation. I am also a Registrant on the RIBA Conservation Register. The NPPG in its design guidance at paragraph 005 advises that "to achieve good design the use of expert advice from appropriately skilled in house staff" may sometimes be required. It is with my knowledge and many years experience that I shall provide you with broad comments on the

application in relation to matters of urban design, principally. I shall also provide comment on heritage matters which in this case relate to the setting of designated heritage assets that are listed buildings and a conservation area; and the loss of non-designated heritage assets.

As you know, the two historic buildings that sit at the front of the application site and which are proposed for demolition were put forward (by a third party) for addition to the statutory list of buildings of special architectural or historic interest during the lifetime of the original application. The Government, on the advice of Historic England (its advisors), rejected the application which means that neither building is a listed building.

I note that Historic England has provided you with comments on the application dated 5th July 2019 and strongly objects to the application on design and heritage grounds. Please note that Historic England is not a statutory consultee in respect of this application and that their comments are advisory only.

Historic England has no powers to call in this application for determination by the Secretary of State. It is a matter of regret that my views on aspects of design conflict with those of Historic England but I believe that I am better placed to provide expert design advice – as a chartered architect, chartered town planner and with an urban design qualification – to you. I should add that, on some of Historic England's views on heritage here, I am in agreement and that should not be surprising.

2.0 The Application

The application documents which I have taken into account in my comments to you are principally the submitted design drawings (original and revised and with the blocks re-lettered); the original Design and Access Statement (as revised); the Addendum Design and Access Statement; the Heritage Statement (not updated); and the landscape drawings (original and revised).

In making my comments to you on matters of urban design I have used my working familiarity with By Design, the Urban Design Compendium, the Manual for Streets 2 and the 3rd edition of Building for Life 12 (2015). By Design is, for me, still the best and was the first government guidance on design in the planning system since 1953. It was published in 2000 and withdrawn in 2014, although its precepts and principles are still applicable, in my view. On withdrawal, the government took the view that it did not intend to publish replacement guidance but that others could and in May of 2017 the RIBA published The Design Companion for Planning and Placemaking, of which we now have a copy in our office library.

Also of relevance are sections 12 and 16 of the NPPF, Achieving well-designed places and Conserving and enhancing the historic environment; and the supporting detailed paragraphs of the NPPG. Also relevant is the Planning (Listed Building and Conservation Areas) Act 1990 which applies to the setting of listed buildings (no other test in this legislation applies here); Historic England's Advice Note 1 – Conservation Area Designation, Appraisal and Management (8th February 2019); Historic England's Historic Environment Good Practice Advice in Planning 3 – The Setting of Heritage Assets (22nd December 2017); and IHBC Guidance Note 'Townscape as an important concept in conservation area management' (August 2017).

3.0 Analysis

I shall refrain from undertaking a detailed description of the site, its former uses and its context as this is provided acceptably within the original Design and Access Statement (DAS). The site is well positioned adjacent Woodbridge town centre and in a predominantly residential area with a strongly urban character. The site is bounded by residential development; an important road linking Melton with Woodbridge; and the East Suffolk railway line that connects Woodbridge and Melton to Lowestoft and Ipswich. Beyond the railway is the River Deben with long views to Sutton Hoo, a site of international historical significance, which falls within the Suffolk Coast and Heaths AONB. Development here will, by virtue of its position, relate well, therefore, to the existing built up area, town centre and urban character in and around this part of Melton and Woodbridge.

The application site falls outside the Woodbridge Conservation Area but lies within its setting. There are no designated heritage assets within the site but there are listed buildings in close proximity to the front of the site at its sides. There are two Non-Designated Heritage Assets within the site at its front that were identified by us as part of the pre-application planning process.

In urban design terms, the site has constraints which will affect its masterplanning and layout:

- * The railway line presents a barrier to the land and river beyond
- * Connectivity by foot into adjacent areas to the north and south is potentially poor
- * Levels changes between the site and areas to the north and south are significant in places
- * The site has a significant sloping topography that principally falls across from west to east

- * The eastern extent of the site falls within a flood risk area
- * The site is bounded by existing close-by residential uses to the north, south and west
- * The site contains non-designated heritage assets
- * The site has a high degree of visibility in long views from the Sutton shore

From these constraints, however, opportunities will arise and for any design to be successful, these should be taken into account and creatively utilised. In my view, these include:

- * Using high quality building and urban design to create the site's own identity such that its local distinctiveness will arise out of being distinctive locally
- * Exploiting existing site features to generate a positively characterised layout of buildings, spaces, aspect, views, routes and edges
- * Acknowledging the existing streetscene and townscape contribution of the historic buildings at the front of the site that are of local importance
- * Being a good neighbour to existing surrounding buildings

Whilst not a comprehensive list of site opportunities, I suggest that these can form a useful test for the current proposals. On this basis, I have the following broad comments on the proposals for development at this site:

3.1 Layout

a. The principal organising element of the layout as illustrated is the strong concept of the landscape thoroughfare. This is a generous idea of a public pedestrian route that connects Thoroughfare and a new public space on it, to another new public space at the bottom of the site that consists of a designed destination which also links laterally to Deben Road. This thoroughfare provides not just a route through the site but also a key view – one that will be retained to be enjoyed by the public – that is, the view across the River Deben to Sutton Hoo (Tranmer House and Reconstructed Mound 2). This is such an important view, such an attractive and almost iconic view (from within the site) that I entirely support the idea of it being embedded within the layout and used to organise it. In this way its importance is reflected in the site layout and this is wholly appropriate. I believe that it can also be argued that the layout is 'gifting' this view as a public view where none is currently available from a similar position. This has to be considered a significant benefit of the proposal and needs to be fully acknowledged in considering its merits.

b. Also of strong concept is the application of a car-free layout. In this way the layout ensures that outdoor space is given over wholly to pedestrian and cycle routes, private garden space, public space, semi-public space and space that can be used communally by residents. A car-free space provides the opportunity for a calm, soft and green setting that is animated by people rather than by traffic (although the dynamic value of traffic is a significant urban characteristic). The idea of utilising the site topography to create underground parking for the entire site in one area is bold and, again, distinctive as an approach and I strongly welcome it as another significant benefit of this proposal. Indeed, I would argue that the application of these two principal layout design drivers - the public landscape thoroughfare and the car-free layout – are outstanding in their approach and which set a high level of urban design aspiration for this site. I would ask the question, where else are, in effect, car-free layouts being designed?

c. The layout pattern is interesting in that it reflects aspects of the surrounding context and urban grain: the frontage blocks relate to the street and provide enclosure; the blocks adjacent the Maltings reflect the same orientation; the lower section of the site which is proposed to have townhouses has a more conventional alignment typical of a small-scale street such as Deben Road, close by. The overall pattern of blocks bears similarity to existing layouts to the north of the site, as illustrated in the original Design and Access Statement at p34 and p79 (Figure Ground Plans). Thus the layout pattern is designed to mediate between the surrounding mixed urban grain and effect a transition between the contrasting urban grains to the north and south of the site. I judge that this is effectively achieved.

d. The layout of the apartment blocks is deliberately angled to utilise aspect and view – key opportunities and design drivers at this site – and helps explain the form of layout: the desire to maximise and optimise the views across to the river and the countryside beyond, and surrounding townscape. This is easier to achieve where a block is angled such that three elevations face outwards rather than one – hence the angled disposition of forms, as here. By three elevations, I also mean the roof elevation, as the dramatically angled roof forms allow their exploitation to provide light and view. In this way the layout has a functionality derived from the desire to exploit site-specific characteristics which gives a degree of order and reason to what, initially, would appear as a random and wilful layout. I think it is, indeed, of great importance to give due consideration to the care that appears to have been taken in the disposition of the layout as I describe it. The resultant layout of blocks is highly distinctive and of outstanding quality, in my judgment.

3.2 Spaces

a. Of high significance and great merit in this layout are the public spaces that are created as ‘anchors’ at the top and the bottom of the site, that is at either end of the landscape thoroughfare, itself a space of high importance. These are spaces that will help animate the street frontage and provide a destination for travel through the site, drawn by the key view across the river to Sutton Hoo. These public spaces do not currently exist and it is a generous and outstanding feature of the application that they are proposed here.

b. The public space at the top of the site is intended for use in conjunction with the ground floor community use of one of the frontage blocks (Block E); and could also be partly used by the retail space in the other frontage block. In this way the public space will be enjoyed by residents and passers-by alike. Indeed, it is worth noting that, due to the extent of new commercial and residential floorspace in the land immediately to the north of the application site, there is an increasing footfall past this site towards the town centre. This footfall increases the likelihood that the public space and adjoining uses will be actively engaged, which is important for the space to be successful and not just a tick on an urban designer's wishlist. Is it appropriate for a public space to be in this location at all? I judge that it is – the space opens up the frontage to the new landscape thoroughfare and the view beyond and invites people to traverse it; it will engage the site with the existing pedestrian route across the top of it from Woodbridge to Melton and reverse; and it is proportionate to the importance of the site i.e. it is not intended to have a large scale civic character. I note that the revised landscape design for the frontage now includes for informally planted beds and new trees to soften and filter the urban architecture of this design and these are welcome.

c. The public space at the bottom of the site utilises its topography and the fact that this area is undevelopable to create a positive feature that is a destination at the end of the landscape thoroughfare. This space also links in to Deben Road, which increases the opportunities available for its use. The space appears to have been designed as one that can be occupied as a viewing platform and to have a soft, green informal character – a 'naturally planted 'wild' area' - that will form an effective contrast to the more urban public space at the top of the site. I judge that the design of these two spaces is effective and well-considered.

d. The character of the landscape thoroughfare space will be ever-altering whilst one transits up or down it – the town scale at the top will flow into a smaller scale ending in an open space bounded by riparian and countryside views of great beauty. Such an experience has the opportunity to afford the pedestrian a rich experience, the detail of which it will be important to understand.

e. Other space within the layout is designed as for either private or communal use, presumably, although the annotation for which has disappeared in the current submission. The former includes private terraces to ground floor apartments and gardens to the townhouses in the lower area of the site. Communal gardens – I assume - are located adjacent the apartment blocks and are designed for use by their occupants. This ensures that there will be a green setting to most of the residences.

f. The intermediate space along the landscape thoroughfare forms an effective transition between the two character areas of this site – between the apartment blocks and the townhouses – and provides important connectivity.

g. In respect of the hierarchy of spaces illustrated in the submission, it is important that there is a delineation between spaces that are for use privately by residents and those that can be shared with other public users of the site. This ensures that the site is legible in terms

of where people should be going or will want to go. In the layout shown here, it appears that the topography of the site will be partly deployed to manage that hierarchy such that level changes (along with planting) will delineate separation between private garden areas and the public thoroughfare space – I assume. Of interest, was the emphasis that the architect placed at pre-application stage on ensuring that even private space could be overlooked and enjoyed from the public space that is the thoroughfare such that it is not necessary, for example, to provide boundaries or fenced screening in these areas. In this way, the garden setting to these new built forms is kept visually open across the site – is this still the intention here? The revised landscape drawings lack detail and clarity on this matter. I assume, however, that the ground floor terraces will provide privacy for their users.

3.3 Routes, connectivity and legibility

a. Legibility is the concept that a layout provides for recognisable routes, intersections and landmarks to help people find their way around. People intuitively navigate their familiar urban spaces through established uses, recognisable buildings or intriguing vistas. Places of anonymous character and bewildering route-finding alienate residents and visitors, and urban design has come a long way since the 1980s to understand the perceptual journeys that we traverse and then translate into legible layouts. Legibility arises out of a clear hierarchy of routes with good connectivity providing a high degree of permeability into surrounding existing areas.

b. In this respect, I judge that the design maximises the limited opportunities that the site offers. By providing a new public thoroughfare through the site between new public spaces, and a new public connection onto Deben Road and access to the riverside beyond, the design links the layout into the existing urban fabric, constrained as it is by the lack of connectivity opportunities along its northern, eastern and southern edges. I could envisage an alternative less appealing layout where this entire site was closed off to any kind of public access and enjoyment, with a solid frontage and mostly private space behind for exclusive use of residents. Perhaps some consider that this would be a better design approach as it is more conventional but is not one that I support at this site where a better alternative is before us.

c. Of great interest here is the primacy given to the pedestrian in terms of the hierarchy of routes.

This is the complete reverse of practically every other development proposal we see, where the hierarchy is established by the delineation of routes designed primarily for vehicle use and with a secondary and tertiary network of pedestrian and cycling spaces following on. Of outstanding quality is that here the organisation of routes is predicated on the primacy of the pedestrian – in his or her own space not ‘shared’ by vehicles – and this is both innovative and laudable: a principal route animated by people, not vehicles. The landscape thoroughfare forms the principal route (and space) which: connects the site to its context at the top and bottom; connects the new public spaces; joins the entrances to the apartments

blocks and townhouses; connects to the underground parking area; and which has its own defined character and which forms an easy route to follow (as illustrated on the Site Plan with Pedestrian Circulation drawing). It is of great importance that this principal route is not a road but a footpath and one which will perform several important roles in connecting up the residential and spatial elements of the site and in a way that is clear and easy to understand in use. Again, I judge this to be an outstanding element of the design. On a technical point, the submitted drawing no.

0250/C/480A 'Site Plan with Pedestrian Circulation' omits to identify that the circulation illustrated in blue is the public route through the scheme. This should be clarified/confirmed by the agent.

d. As a consequence of the layout, there will be a physical separation of vehicle and pedestrian routes, such that vehicles have a separate and defined access to the site in approximately the same position as exists currently. This is limited in extent to the top corner of the site where 2-storey parking will be provided in that area of the existing site where the topography takes a 'dip' towards the Maltings. From the car park there are proposed pedestrian connections to a centrally positioned access core and separately to the lower area of the site. Fire tender and ambulance access are permissible via a service road as far as the intermediate public space on the landscape thoroughfare, which can double as a turning head; access for maintenance vehicles will be permissible to the bottom of the site. The success of this layout where vehicle access is secondary to pedestrian access will be partly predicated on the concierge management of the site for deliveries, waste and servicing (strategies for which are illustrated in the application and described in section 8.0 of the original DAS). From discussion with the applicant at pre-application stage, it is clear that thought has been given to this issue. The result in practice may have something of the experimental about it but could also offer a useful blueprint for the development of constrained urban sites and, in this respect, I judge the proposal to be innovative.

3.4 Density and building heights

a. The approach to density and building heights in the design produces two differing sorts of character areas in the upper and lower parts of the site. The upper part is characterised by apartment blocks of differing scales; the lower part is characterised by townhouses giving on to the greensward and public space at the lower end of the site. The decision to design a scheme that utilises apartment blocks as its principal typology has provided for a densification of development and the maximisation of resultant open space greater than that which may have been envisaged when the planning brief was prepared by SCDC initially.

b. As you know, I expressed reservations regarding the scale of some of these blocks during the pre-application process such that the design was modified to reduce it. I challenged whether it was appropriate to employ this building typology - more akin to city-scale development - within a market town. The architects took the view that there is precedent for (new and existing) development of a similar scale within the context of this

site. Further, the now complete development at Whisstocks and Nunns Mill includes the use of 4-storey development on sites at the edge of the town centre; and 4-storey development is visible next to the application site at the Malt Yard and the Old Maltings. I appreciate that this aspect of the proposal is contentious and that many may consider the approach taken to be fundamentally wrong in this regard.

However, I am satisfied that the scale of the blocks has been carefully considered such that it has been reduced along the street frontage to respect the streetscene context – Block E has been reduced further in height by 750mm; and to Blocks A, B and C to avoid an overbearing impact on neighbouring properties. It is also important to note that the storey heights of each block vary across their depth from, for example, five to three or two, or four to three; and that these are not, therefore, monolithic five storey blocks at their highest. In this way, some of the scale impact of the design is mitigated. This is usefully illustrated in the massing comparison with neighbouring large buildings shown on Site Sections/Elevations 1 and 2.

c. I am also satisfied that this site is not a suburban site and that suburban densities would be inappropriate. This site is an edge-of-town centre site with a fully urban character such that development of the density proposed here will help support the viability and vitality of the town centre in which it is in such close (walking) proximity. It is of great importance that the opportunities, as presented here, are taken to do so and I support this scheme on that basis.

More intensive forms of development are important in making the best use of well-connected sites.

d. Of interest to me is how the scale of the proposed architecture creates a new rising and falling site topography through the mass, form and scale of these blocks and I find this an appealing approach. On long views into the site these blocks will establish presence and, positively designed, I fully support the validity of this: a bold and confident approach to place-making and the creation of 21st century townscape. It is an approach wholly appropriate in calibre for a town like Woodbridge which, in its historic core, riverside and some suburban areas, enjoys the highest quality evolved townscape. It would be very welcome to see this calibre being reflected at other development sites in our District's towns.

e. A consequence of the building heights proposed here is a juxtaposition in scale between new and existing buildings that will arise, particularly along the street frontage. However, as at Nunns Mill where such scale juxtaposition is evident, it is my view that such scale contrasts can animate urban form and are an essential component of it (but not of suburban form). I appreciate that this will be a view that is not shared by all for whom more of a blending-in approach, scale-wise, would be considered more suitable. Such an approach would not be wrong here – it will just be less interesting.

3.5 Uses

a. I welcome the mix of uses that is proposed here. The proposal is for a new street frontage that will include active uses, including community uses and retail. Although residential use of this site is clearly a high-value use, it is important that the design does not promote a monolithic single use in a site so close to the town centre. The community and retail uses will activate the frontage of the site and the architecture of these buildings is designed in such a way that this is expressed through their character. This is in contrast to the former employment use of the site which had, in effect, a dead frontage with no active connections, except for the pedestrian link down the side of the site to a 'front door' that was not on the front at all. The frontage mixed uses in conjunction with the new public square, therefore, provide a good opportunity for the scheme to contribute positively to context, beyond the important provision of new housing.

3.6 Edges

a. When considering development proposals it is always important to consider how the designed layout will meet the edges of the site. It is important to understand that the edges have been taken into account by the layout and not ignored. I have already discussed the edges at the top and bottom of the site (i.e. to the east and west). The northern edge of the site consists of the vehicular access to the site including a service area, visitor parking and a bin marshalling area; and the ramped access and egress from the underground parking area. The north-eastern edge of the site consists of the underground parking area and the pedestrian access to it from the intermediate public space on the landscape thoroughfare. The parking area and egress is partially surmounted by Blocks G and H.

b. There is little doubt that this is the 'business' end of the site in terms of the activities that are focussed here, including the relocation of the substation to the area next to the proposed bin store. This is a sensitive edge, given the proximity of recent and existing residential development. However, the position of the access off the main road and the route to the underground parking means that the route is the shortest that it can be, to take account of the required gradient; and that use of a residential block on top of the parking means that this does not become a 'multi-storey car park' feature on the site. Indeed, it will only be visible along the north-eastern edge of the site where planting should mitigate some of its negative effects on neighbouring properties. A drawback to this arrangement is that part of the space that surrounds Block G on two sides is not attractive communal gardens but a ramped vehicle access and stepped underground car park.

c. In respect of the southern edge, this is shown to consist of a mix of private rear gardens and rear communal gardens and private ground floor terraces serving apartment blocks A, B and C. All of these are south-facing and back on to existing rear private gardens, which is appropriate. The existing green edge will be reinforced to mitigate some of the impact of the new development on adjacent gardens and this is welcome.

3.7 Built form, character and materials

a. Of note with this scheme is the distinctive form of development proposed, not just in terms of its car-free and public landscape thoroughfare approach, but the form, mass and layout of the apartment blocks and townhouses. What is proposed here is a new kind of place-making through the careful juxtaposition of forms and spaces to create townscape of interest and positive character. This approach has been wholly derived from the applicant and his architects' conceptual approach to this site. The strength of this approach was evident at the outset and has been carried all the way through the pre-application process and public consultations, with the result that the proposed scheme is an innovative and outstanding example of urban design, in my judgment.

b. In terms of the character of the proposal, I do recall discussions with the applicant and architects over the idea of 'Woodbridgeness', which term I had never used myself in scrutinising development proposals in the town. It is important that the design, as it does here, respects key characteristics of its context, including the use of materials, scale and urban grain, for example.

The proposals here include the use of white brick, red brick (in Flemish bond), and natural slate and clay plain tiles – a palette of materials, the diversity of which is evident in the town. The mixed scale of buildings also reflects that of its context – from modest terraced forms, large villas in generous gardens to buildings of substantial scale as at the Maltings and Malt Yard, which are big buildings. The urban grain of the proposal again borrows from its neighbours and melds them to create a site-specific response. In these ways, I judge that this proposal is entirely suited to its situation in Woodbridge/Melton because it could not have been designed for any other site. In this way the scheme design is Woodbridge in character – appropriate and justified.

c. When considering the historic evolution of Woodbridge and why the approach to built form and character here can be judged appropriate, it is important to consider that Woodbridge's central townscape has evolved over centuries. This has provided us with a handsome historic townscape of the highest quality with evidence of late medieval, Georgian and Victorian architecture gifted to us by preceding generations, to the highest standard of design and quality, making the town special. I judge that it is our duty to carry on this process with design of our era, of the 21st century, reflecting the way that we build and live today and not aping past styles. I should like to illustrate this point by looking at the area of Woodbridge around St Johns Street.

This is a fine example of determined Victorian town planning, with formal streets and architecture of white brick and slate. It immediately abuts the medieval core of Woodbridge and yet looks nothing like it in character. It looked entirely novel at the time and reflects its era; and is now cherished townscape. I should also point out, of course, that the rest of Woodbridge – that part outside the historic core - consists of average-quality suburban townscape of a character that can be found in any small to medium-sized provincial town. This aspect of Woodbridge and what people perceive to be its quality should not be ignored.

d. In the case of the current application I judge that the design will promote local distinctiveness through being distinctive locally – which is proper – and that its built form

and character are original and innovative in approach and of a high standard, reflecting the quality of its wider urban context and adding positively to the continuing architectural evolution of Woodbridge's and Melton's townscapes.

3.8 Detailed design

In terms of detailed aspects of the design, I have the following comments to make. I would say that, in conjunction with the visualisations included in the DAS, the design is comprehensively illustrated.

Frontage buildings D + E

- a. I judge it appropriate that the proposed replacement landmark building (building E) to the streetscene frontage is the building that includes community use. This will be a semi-public building and its architecture (prominent position, distinctive cantilevered design with a glazed ground floor, and use of white brick uniquely on the site) expresses its importance in the streetscene and wider context. This building also plays a key role in the management of the site in terms of the concierge facility. I note that the eaves and ridge heights of this building have been reduced by 750mm compared to the original submitted scheme; and that the community uses are now confined to the ground floor, only (two floors previously).
- b. The use of cantilevered brick to building E can be done beautifully where the brick is used to the soffit and examples in our District include the archive centre at the Red House, Aldeburgh and 75 Broad Street, Orford – both winners/commendees of our Quality of Place awards.
- c. I like the idea that building D to the frontage includes a retail unit with living accommodation over. This idea of 'living over the shop' is a strong feature of Woodbridge's Thoroughfare. I like also that it has domestic scale gardens included which relate to the more traditional townhouse-garden relationship visible opposite the application site.
- d. I also welcome that the retail unit will address the new public square and will hopefully add activity to it. Like the community building (E) the glazed open-ness of the ground floor signals the different uses to the residential uses above and behind; and will offer welcoming spaces to use.
- e. The muted colour palette of building D references the existing building in this position and reflects the palette of villas opposite (dark/weathered brick and natural slate roof).

Apartment blocks A-C, F-H

- a. I like that some of the apartment layouts are designed to provide occupants with a view out of the building directly on entry.

b. I note that the external pattern of fenestration to the apartment blocks is deliberately varied in terms of the position, size of openings and cill and head levels. This provides an interesting interplay between solid and void which helps to animate the potentially monolithic forms of these blocks. I note also that, in the contemporary language of the architecture used here, some of the openings are of a generous size. This is in contrast to pastiche architecture which can have mean little openings in an attempt to imitate historic buildings. c. I think that some of the windows to the apartment blocks are positioned to be either flush or recessed with reveals, although I may be misinterpreting some of the application drawings. This variety would provide some welcome modelling to the facades.

d. I note that some areas of external brickwork to the apartment blocks are proposed to be patterned by using a Flemish bond with recessed headers. I welcome the use of decorative brickwork, which has been a Suffolk tradition for centuries (17th century diapering), and which will help animate the appearance of these blocks. At times, the brick walling becomes the edge to an inset roof terrace and the walling here will have the headers missing to provide a perforated appearance which, itself, will be both decorative and practical.

e. It is clear from the plans and sections of the apartment blocks that several units have been designed with dramatic internal levels and spaces and external terracing such that a homogeneous standardised floor template used throughout has been avoided. This is welcome and is an illustration of how the distinctive forms of these blocks also generate interesting internal architecture.

f. Some of the elevations to the apartment blocks illustrate what are annotated as 'slot drains' by which I think is meant secret gutters. This is a design device whereby the gutter line sits behind the eaves, such that the eaves is cleanly expressed without any gutter attached or downpipes. It would be useful to understand if this detail is proposed across all the buildings and how it will actually be achieved. The detail is more common on metal roofs but I have not seen it used on tiled roofs.

g. The 'elevation extract' drawings are useful in providing an illustration of the design aspirations for the appearance of the apartment blocks. I would say from these that it may have been better to have used the idea of the patterned brickwork more extensively to ameliorate the unrelieved planar facades of these brick blocks.

h. I welcome that the former block K in the lower area of the site has now been replaced with a further pair of townhouses (units 12 and 14). In my original comments to you I did suggest that this building would have been better as another townhouse rather than a stand-alone hybrid design and I am pleased that my views have been seemingly taken into account.

i. Buildings G and H are of particular interest given the rotation of the internal floorplate to sit at 45 degrees to the external envelope. The resultant internal room forms are unusual and create a range of diverse spaces including the use of duplexes. That these blocks are intended to provide affordable units is welcome as it illustrates that there is no

second class treatment of the proposed occupiers. I do, however, have a significant reservation about the tilted floorplates and that is that they produce single-aspect north-facing apartments. I consider this to be an example of poor design creating unappealing habitable quality and should have been re-considered between the original application and now.

j. I do feel that the elevations to these apartment blocks are somewhat unrelieved and could have benefited from greater modelling, variety of fenestration and/or the use of decorative brickwork, as proposed elsewhere.

k. In terms of the position of buildings G and H, I would say that building H is well integrated into the layout – it is well connected to the landscape thoroughfare, as all other buildings are with the exception of building G which feels as if it off at the edge of the site. However, I judge it appropriate that the entrances to these two buildings face each other across an entrance space (or ‘communal terrace’ as it is styled on the landscape concept plan) and that, thereby, they are in a direct relationship.

l. On a general point about rooflights, I did say originally that I was disappointed by the quantity which has been used across these blocks. When looking at their plan position, I can understand the justification for some of these – internal bathrooms or stairwells. Rooflights are not particularly attractive features and, for me, always represent something of a design failure, as if they have been added in after completion rather than part of the original design. I note that the current scheme includes for an overall reduction in the number of rooflights used across the apartment blocks and this is welcome.

Townhouses 1-14

a. I am pleased that the design approach for producing distinctive architecture has been mostly (but not entirely) maintained in the proposals for the townhouses in the lower area of the site. The approach of using angled roofs, highly modelled forms and distinctive fenestration patterns is carried forward into the townhouses but with contrasting architectural results.

b. The use of dark cladding, grey brick and dark roof coverings will ensure that these dwellings will have more of a visually recessive character when seen in longer views to the site; and, as a muted palette, will form an interesting and effective contrast to the prevailing colour palette of the apartment blocks behind.

c. Again, the plans and sections of these townhouses reveal how the sloping topography of the site is mirrored internally, with split levels to dramatise internal space.

d. The townhouses in their pairings represent a variation on a theme in terms of their design, designed to gain light and aspect. Units 1-4 are oriented to front directly onto the new public space and greensward at the bottom of the site which will ensure that it is well supervised and also enjoyed by the occupants.

2-tier car park

- a. The plans for the 2-tier parking show the layout to be efficient and which minimises the space necessary for access, egress and circulation.
- b. The same plan now details the pedestrian circulation core that will provide access to the upper levels and which contains a staircase and lift, information not previously provided.
- c. The layout plan confirms the separate pedestrian connection from the upper level to the lower area of the site layout, which will provide a more direct route for those occupying the townhouses, if parked on the upper tier.
- d. The car park will be set back such that the ramped connection down to the lower tier and between the lower and upper tiers, and the forward section of the upper tier of parking, will be open, as will be their vertical face to the east. This will provide natural daylight and ventilation to enter these spaces.

Site sections/elevations

- a. In respect of changes that have been made to the design of the elevations of the apartment blocks and townhouses – which changes appear to have been undertaken by a different designer from that of the original scheme – my view is that they do not offer quite as refined a design approach as that previously submitted. I do not regard them as improvements to the quality of design.
- b. The site sections are critical in being able to understand the heights of individual buildings; their scale relationship to each and surrounding buildings; and the effect of the site's topography.
- c. Site Section/Elevation 1 is, in effect, a section through the landscape thoroughfare along the site's main axis. This illustrates the contrast in scale, typology and character between the upper and lower parts of the site. It also helps model the apartment blocks to illustrate the dramatic manner in which their scale changes from their highest point to their lowest point. Truly, the 'fifth' elevation i.e. the roof, will, indeed, become a key visible element of their design, dramatising the character of these blocks. This section also illustrates how the replacement frontage building C will successfully mediate between the streetscene and the scale of the raised villas beyond to the west and that of apartment blocks behind. Also of interest here is the rising and falling topography of the roofline created from the front to the back of the site.
- d. I think that Cross Section/Elevation 2 is intended to illustrate the impact of the proposal on garden occupiers of Deben Road properties. The building-to-building distance is a healthy 49 metres and, due to existing edge screening by trees, the upper parts of the apartment blocks, only, will be visible to garden occupiers close to their dwellings and not much visible at all further into their gardens, in this one example.

e. Site Section/Elevation 3 is useful in showing the offset between buildings G and H and the existing Maltings building beyond, including the setback at the level of the proposed 2-tier car park. You will need to satisfy yourself in respect of impact on neighbouring properties, although the distance of 26 metres between the building G and the Maltings is adequate, in my view. The edge to the car park is closer at 15 metres and will have to be carefully designed in terms of screening and appearance to mitigate its impact: the 'green boundary' illustrated looks promising in that respect.

f. I understand that Site Section/Elevation 4 which illustrates the southern boundary of the site to the rear of Deben Road properties includes reasonably accurate renditions of the existing tree cover along this edge. Also illustrated is the profile of the existing 3-storey office building.

g. This section is also useful for showing the scale relationship between buildings D and E and their streetscene context. There is little doubt that the apartment blocks shown will have a noticeable impact along the southern boundary and within the streetscene, but that this need not be adverse.

h. Cross Section/Elevation 5 is interesting as it is a reminder that, in the broader townscape context, the application site will be seen in long views from Sutton Hoo against rising and tree-ed land behind, such that it will neither break nor form the skyline to Woodbridge/Melton in this area. Further, in the same long views, Melton Grange should remain pre-eminent as the local landmark building that is surprisingly visible.

i. I must say that the elevation to the 2-tier car park illustrated in this same drawing is irritatingly fuzzy and it is difficult to understand fully how this edge of the site will appear when viewed from the Maltings – an important view if you are a resident.

j. Cross Section/Elevation 7 provides, in effect, a useful illustration of the view through the site from close to the bottom to the top.

3.9 Original Design and Access Statement (re-submitted)

I have the following comments to make on specific parts of the DAS of relevance to my areas of interest:

a. Section 5.0: Design. The idea of the urban villa is interesting in the way that it is expressed here but I am not entirely convinced of its direct application to the organisation of the site. I do, however, understand and agree with the idea of the 'landscape thoroughfare', the principal route through the site.

b. I judge the massing diagrams illustrated on pp84-85 useful in describing in a simplified fashion the derivation of the proposal in terms of its massing, disposition of blocks and layout of spaces.

c. The lighting strategy (p138) provides a reasonably comprehensive understand of how the differing spaces will be illuminated – the landscape thoroughfare; the routes to the apartment blocks and townhouses and also their entrances; the upper and lower public spaces; the car park and vehicular and pedestrian routes in and out; the street frontage; and the route to Deben Road. We will also need to understand the design of the luminaires and proposed lux levels; and the overall impact on the night-time character of the site when viewed in context. I accept that, if approved, much of this could be Conditioned. The strategy, itself, provides an acceptable approach that acknowledges the needs of users and the transition between the urban context at the front of the site and the landscape-dominant character at the bottom of the site.

d. The graphic representations on p103 are of interest. I have never seen development proposals illustrated in this unusual manner where existing and proposed spatial uses are compared using pie charts. It does illustrate some interesting points: that the footprint areas of the existing office building and the proposed residential buildings are similar; that the area of public realm is much higher in the proposal; and that the area given over to road use and parking is proposed to be much reduced. These last two can be considered to be important attributes of the design.

e. At p132, we need to be satisfied that the approach to the provision of playspace described and illustrated here is satisfactory. From what I understand there will be no formal areas of playspace designated within the layout but that public open space is meant to provide the opportunity. It may be worth bearing in mind that the site is reasonably well connected to Elmhurst Park, which has formal and informal play areas and recreation space.

f. In respect of section 8.0 Management Strategy Statement, it is important to understand if this also applies to buildings G and H, which will contain the affordable housing units. Is it expected that any RSL taking these on will be expected to undertake a similar level of service; or buy-in this service from the on-site facility?

3.10 RIBA Suffolk Design Review Panel

a. To clarify Appendix B of the DAS, design review was conducted externally and independently by the RIBA Suffolk Design Review panel, at our request and agreed to by the applicant and architect. Therefore, the full reference here should be to the RIBA Suffolk Design Review Panel.

b. We ensured that the feedback provided during the external design review was used to support the ongoing design discussions that took place as part of the pre-application process.

c. I should point out that the design review panel consisted of architects and a landscape architect with high regional reputations; and a heritage adviser who was formerly the Head of the eminent historic buildings team at Essex County Council.

d. The DAS includes at Appendix B the three written reports of the design review panel. I note that in its second report the panel expressed its support for the project, with caveats which were the subject of its third report.

e. In respect of the third and final panel report, I note that it confirms that the frontage architecture of building C (as was, now E) is better resolved; that it still regarded the change in scale along the Deben Road garden boundary abrupt; and that the quality of open spaces and landscape strategy required better thought.

f. I suggest that you seek the views of our colleague Nick Newton to understand if this last point about open space and the landscape strategy has been acceptably addressed in the current submission.

g. In respect to the comment about building scale, I can confirm that the blocks formerly labelled G and I were reduced by a full storey subsequent to the final report and in response to the concerns expressed in it.

3.11 Analysis Conclusion

The Government attaches great importance to the design of the built environment and has articulated how this is achievable at Section 12 of the NPPF, detailed particularly in paragraph 127. In including the detailed criteria, the NPPF states that planning decisions should aim to ensure that developments function well and add to the overall quality of an area; area visually attractive as a result of good architecture, layout and landscaping; are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); establish a strong sense of place; optimise the potential of the site to accommodate development; and create safe and accessible environments.

With reference to all of my comments, above, I am of the view that the application scheme will meet the criteria of paragraph 127 that I, myself, am able to judge. The scheme offers a site-specific response and design that is detailed in its consideration, innovative in some aspects of its approach and outstanding in some aspects of quality. It will be distinctive locally and through that create an identity from which its strong sense of place will be derived. I judge that the site has been optimised for development and that its scale is appropriate for its edge-of-town centre location, vital in supporting local facilities and with good access to transport networks. The design responds to its context through its varied and mediating urban grain and choice of materials whilst adopting an innovative approach to form, design and appearance, with visually enhancing results, the consequence of which is a high quality scheme, appropriate for its high quality urban context in the Woodbridge and Melton townscape.

I judge further that, through the creation of a new community building, new public spaces and a new public landscape thoroughfare through the length of the site with good physical connections to the existing wider townscape and key visual connections to the protected landscape beyond, and in its choice of materials, this scheme will offer good integration into its context, as far as physical constraints permit.

Also of relevance is paragraph 129 of the NPPF which states that LPAs should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include design advice and review arrangements. East Suffolk Council employs me as an architect to provide that design advice – uniquely amongst all Suffolk authorities. We also have local design review arrangements in place to support and ensure high standards of design. We have met this requirement by referring the scheme at pre-application stage three times to the independent RIBA Suffolk Design Review Panel, with the agreement of the applicant and architect, for scrutiny. I have had regard to its recommendations in my comments, above. Paragraph 129 states that, in assessing applications, LPAs should have regard to the recommendations made by design review panels and I assume that you will do so in your considerations. Reference here is also made to use of assessment frameworks such as Building for Life 12. I note that the emerging Suffolk Coastal Local Plan includes for the use of this tool for major residential development proposals in its policy on design quality (Policy SCLP 11.1).

Also of relevance, in my view, is paragraph 131 of the NPPF. This states that “in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.” Notwithstanding some reservations regarding some detailed aspects of the scheme, I do judge that it is innovative in some aspects of its approach and outstanding in some aspects of quality and that it contributes importantly to the raising of the standard of design more generally in our District, a very important objective to secure. However, an important change in this paragraph from the NPPF that was in use at the time of the original application

is the qualification that the outstanding or innovative design should ‘fit in’ with its surroundings. I regard this as a regressive qualification but one that we must now take into account. My own views, expressed above, are that the submitted design has more of a contrast effect with some of the form and layout of the surroundings to the application site and, thereby, the scheme cannot now be accorded great weight in respect of its outstanding design quality as per this NPPF test.

4.0 Heritage Assets

In determining the application, it is necessary to assess the impact of it on three different types of heritage asset: a conservation area, listed buildings and two non-designated

heritage assets. Different statutory duties and policy tests apply to each type of asset and I summarise these here.

For conservation areas, the statutory duty under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. However, the duty only applies when the planning authority is determining a planning application in respect of “buildings or other land in a conservation area”. Where development is proposed outside the boundary of a conservation area – as here - the statutory duty is not engaged (although the NPPF is still relevant, as set out below).

For listed buildings, s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a duty to have special regard to the desirability of preserving listed buildings or their settings or any features of special architectural or historic interest which they possess. The duty is engaged when the planning authority is considering whether to permit development which affects a listed building or its setting. Therefore, even if a listed building is not directly affected by a proposed development, the duty will still apply if the development affects the setting of the building. In the case of *East Northamptonshire DC v Secretary of State* (‘Barnwell Manor’), the Court of Appeal held that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight” when the decision-maker carries out the balancing exercise; and that a finding of harm to a listed building or its setting gives rise to a “strong presumption” against granting permission.

There are no statutory duties concerning non-designated heritage assets.

The National Planning Policy Framework identifies protection and enhancement of the historic environment as an important element of sustainable development. The core planning principles of the NPPF are observed in paragraph 8 which includes the need to ‘contribute to protecting and enhancing our natural, built and historic environment’. Paragraph 192 says that when determining planning applications, account should be taken of ‘the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation’; ‘the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality’; and ‘the desirability of new development making a positive contribution to local character and distinctiveness.’

The NPPF at paragraph 193 requires planning authorities to place ‘great weight’ on the conservation of designated heritage assets, and states that the more important the asset the greater the weight should be. Paragraph 194 recognises that significance can be harmed by development within the setting of an asset. This paragraph also states that ‘any harm or loss should require clear and convincing justification’.

It is important to note that this paragraph applies to all designated heritage assets. Therefore, although the statutory duty in s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is not engaged by development outside the boundary of a conservation area, the NPPF makes clear that (i) the conservation area still has a setting and (ii) the approach should be the same for all types of designated heritage asset, therefore harm to the setting of a conservation area should be treated in the same way as harm to a listed building or its setting when a planning application is being determined.

Paragraph 195 of the NPPF applies where development would lead to “substantial harm to or total loss of significance” of a designated heritage asset. Where that is the case, it advises that planning permission should be refused unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or four other criteria are satisfied (which relate to the absence of reasonable or viable uses of the asset). In the case of *Bedford BC v Secretary of State for Communities and Local Government*, the High Court said that “substantial harm” meant “such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced”.

Paragraph 196 of the NPPF applies where a development proposal would lead to “less than substantial harm” to the significance of a designated heritage asset. In such cases, it says that the harm (which, as per paragraph 193, must be given great weight) should be weighed against the public benefits of the proposal.

In the case of *Jones v Mordue* the Court of Appeal confirmed that this part of the NPPF corresponds with the statutory duty in s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and, therefore, if a decision maker works through paragraphs 192-196 of the NPPF according to their terms, the statutory duty will have been complied with.

In the case of non-designated heritage assets, paragraph 197 of the NPPF says that the effect of a proposed development on their significance should be taken into account, and that where a development would affect a non-designated heritage asset either directly or indirectly a “balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.

The NPPF at Paragraph 200 highlights the opportunity for local planning authorities to look for new development within the setting of heritage assets that will enhance or better reveal their significance.

Proposals that therefore preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably. Paragraph 199 makes provision for developers ‘to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact’

With regard to the setting of heritage assets, this is defined in the NPPF glossary. The NPPF states that elements of a setting that make a positive or negative contribution to the significance of an asset may affect the ability to appreciate that significance. The NPPG further advises that the extent and importance of setting is often expressed by reference to visual considerations and that, although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. Historic England advises that setting is not a heritage asset, nor a heritage designation. Its importance lies in what it contributes to the significance of the heritage asset.

Historic England has published relevant advice, which I have already referred to in section 2.0, above.

This advice is non-statutory and aims to assist decision makers to follow good practice. I have taken this advice into account in preparing these comments.

4.1 Heritage Impact Assessment for Melton Hill Development Site, Woodbridge

I can confirm that the submitted Heritage Impact Assessment (June 2017) meets the information and impact assessment requirements of paragraph 189 of the NPPF. The HIA is that which was submitted with the original application and it appears not to have been updated for the current submission.

4.2 Setting of Woodbridge conservation area.

I have followed the guidance in Historic England's advice note on following a stepped approach to views and setting by: identifying the heritage asset and setting affected; assessing the degree to which the setting contributes to the asset's significance; assessing the affects of development on significance or the ability to appreciate it; and exploring ways to minimise harm.

The application site falls outside the Woodbridge conservation area, a designated heritage asset, which means that the development proposal will not affect it directly. The site partly abuts the conservation area along a short section of the site's frontage. The application site can be described as falling within the setting of the conservation area.

Woodbridge conservation area was designated in 1969 and extended in 1971 and 1975. It was re-designated in 1990. A review of the conservation area boundary has been proposed with suggestions for change being made by the Design and Conservation Team, the Woodbridge Society and local residents.

A public consultation by our Design and Conservation team has recently closed on these suggestions which did not include the application site ([http://www.eastsuffolk.gov.uk/planning/design-and-](http://www.eastsuffolk.gov.uk/planning/design-and-conservation/conservation-areas/woodbridge-conservation-area-boundary-review/)

[conservation/conservation-areas/woodbridge-conservation-area-boundary-review/](http://www.eastsuffolk.gov.uk/planning/design-and-conservation/conservation-areas/woodbridge-conservation-area-boundary-review/)). Work on the proposals will re-commence in late summer to take them forward.

Woodbridge has an adopted Conservation Area Appraisal SPD (July 2011). That part of the conservation area closest to the site falls within Character Area 9, summarised on p19 of the Appraisal as “Thoroughfare, from Cross Corner to Pytches Road. The commercial heart of the town, with a continuous built up frontage of 18th & 19th century vernacular facades standing on the back edge of the footway. There are fine detached and semi-detached Victorian villas north of Sun Lane”. The Appraisal identifies nos 103-117 opposite the site’s frontage as significant buildings with important front boundary walls (on the summary map at p100). There are no important views or important open/green/tree space in that part of the conservation area that abuts the application site. This area makes a moderate contribution to the character and appearance of the conservation area.

Reference to the north end of the Thoroughfare is made at p70 of the Appraisal, where it states that “the landform rises on the west side of the road and the houses are built well above the road level with generous front gardens”. On p75, the Appraisal states that the “end of the Thoroughfare, beyond Sun Lane, contains Nos. 103 to 117, a good group of Late Victorian and Edwardian houses, alternating between detached and semi-detached plans, set back above the road in spacious front gardens, enclosed by garden walls, with gates and piers and clipped hedges. The construction of the row commenced with the high number prior to 1875.” More detailed architectural descriptions of these buildings follow in the text. Clearly, this area of the town up to the edge of the parish boundary with Melton was subject to modest residential expansion in the late Victorian and Edwardian era.

In the Conservation Area Management Plan that forms part of the Appraisal, it is stated at p89 ‘Design of new development’ that “proper account should also always be taken of the impact that new development adjacent a conservation area can have on its setting. Although a conservation area boundary represents a demarcation enclosing a special area of historic interest, changes immediately outside of it can still have a significant impact on character and appearance. The setting of the conservation area, therefore, has an intrinsic value that must be acknowledged in any proposals for change to it.” This wording reflects that of the NPPF (which post-dates the Appraisal) at paragraph 194 which refers to the potential for the significance of a designated heritage asset (including a conservation area) being harmed through development within its setting.

It is my view that the application site, itself, does not contribute importantly to the history of Woodbridge as it fell well outside the medieval origins and historic core of the town. This is confirmed by the DBA report which suggests that its archaeological potential is mostly low. The site lies adjacent the important route joining Ipswich to Great Yarmouth via Melton and Lowestoft but appears to have remained undeveloped until the 19th century. Areas of land around the application site became industrialised during the late 18th century and then

19th century with the advent of the railway. Late 19th century industrial activities in the area of the site included brickworks and associated kilns, iron foundry (specialising in the manufacture of agricultural equipment), timber yard, osier bed, and maltings. Historic uses of the application site included as a plantation and residential use and garden land allied to the expansion of Woodbridge northwards in the later 19th century. Brickworks and kilns were located immediately beyond the application site to the north-east in the 19th century and also to the south, one of which on Deben Road is now a dwelling (and Grade II listed). Not until the late 19th century, therefore, did Woodbridge's development entirely encroach upon the parish boundary with Melton. Thus the development of this area of the town around the application site is relatively modern and the contribution of the application site to the significance of the conservation area as part of its setting is very limited. Also worth noting in this respect is that the application site, itself, is occupied by the now vacant Council offices which are – with the exception of the two non-designated heritage assets – modern, being mostly post-WWII in origin and including extensive areas of parking.

The conservation area in Woodbridge is very large (103 ha), such that the Appraisal identifies eleven character areas within it. It has, therefore, a very wide and extensive setting in all directions to it. The position of the application site is such that the proposed development on it will impact views into the north-east corner of the conservation area from the wider area, for example Sutton shore and Sutton Hoo. As stated above, the development will affect the ability to appreciate the significance of the conservation area by intervening in longer views across to the north-east corner of the conservation area. However, the minor extent of conservation area affected (and its moderate contribution to the character and appearance of the conservation area) will not restrict the ability to appreciate the significance of the wider conservation area as a designated heritage asset, in my view.

In its section on the setting of the conservation area, the Appraisal states that the River Deben and its farmed and tree-ed eastern banks of the Sutton shore “form the setting to the east of the conservation area. The estuarine, open and undeveloped character of this edge forms a significant contrast to the built form of the town and provides key views across and into the conservation area” (p19). This indicates that the main views of the conservation area from Sutton shore which contribute to significance are those directly into it where the boundary of the conservation area abuts the River Deben. Development of the application site would not impact on these key views apart from being seen incidentally in a wider view, spatially removed from the edge of the conservation area and in the context of other large and more modern development to the north of the application site.

In respect of the historic frontage buildings proposed for removal, I judge that these do contribute positively to the significance of this part of the conservation area. The position, character and historic derivation of these two buildings modestly complement those opposite that fall within the conservation area, although it must be borne in mind that neither building was considered to justify inclusion within the conservation area at the time of designation or in subsequent boundary reviews. Loss of these buildings will harm their

positive contribution to the significance of the conservation area and cause less-than-substantial harm to the conservation area's significance. I judge that this harm will be of a minor magnitude as neither building contributes appreciably to the significance of the conservation area. This is, therefore, less than substantial harm which will need to be given great weight and will need to be weighed by the decision maker against the public benefits of the proposal, as per the test in paragraph 196 of the NPPF. I have already commented on what I consider to be the outstanding quality of the proposal in terms of some aspects of its design, above, but there will need to be other public benefits of the proposal which fall outside the scope of these comments and which will need to be taken into account by the decision maker.

In my view, there are no other adverse impacts on the setting of the conservation area arising from the development proposal. It is inherent within urban contexts that change takes place over time, that buildings come and go and are replaced with newer forms of development. This pattern is shown to be acceptable within conservation areas (on a large scale, for example, at Whisstocks) as much as it can be outside it within their setting, where that setting is already developed. The scale and character of the proposed development in its design will represent such change which will be positive in terms of overall design quality and negative in terms of the loss of the historic frontage buildings.

4.3 Setting of listed buildings

I have followed the guidance in Historic England's advice note on following a stepped approach to setting by: identifying the heritage asset and setting affected; assessing the degree to which the setting contributes to the asset's significance; assessing the affects of development on significance or the ability to appreciate it; and exploring ways to minimise harm.

The Grade II listed Maltings Cottage is 17th century in origin, timber framed and rendered with a tiled roof. It appears to be listed for group value which is confusing as there are no other proximate listed buildings with which it shares this identified value. The significance of the cottage is derived from its historic origins, traditional form, layout and materials and its position at the edge of Melton parish. The Cottage's principal elevation is at right angles to Melton Hill, facing the application site, and is visible and thereby prominent on approach northwards along the Thoroughfare to Melton Hill. Its distinctive gabled end elevation is also prominent within the streetscene. Its name suggests it was occupied in association with the maltings that succeeded the brickworks on the nearby site at the end of the 19th century, although the Archaeological DBA report suggests that the industry originates nearby in the 17th century; this association also contributes to its significance.

The setting of the Cottage consists primarily of its garden curtilage and the space to the front of it which provides the existing vehicular access and parking area to the former Council offices. This space is important as it contributes to an appreciation of the significance of the Cottage and is an established and historic view which, although encroached upon by built development in the 19th century and 20th

century, remains intact. This key view across to Maltings Cottage is important in understanding its significance. The view reveals its principal elevation, vernacular form and traditional materials of construction along with its unusual gable end-on-to-the road orientation.

The application site appears to have enjoyed no likely historic relationship to the Cottage in terms of ownership or use, other than that the northern access area may have formed its front garden originally (this is speculative). The application site was developed for residential and garden use during the 19th century as Woodbridge expanded towards the parish boundary with Melton. However, this development and the site's existing buildings are incidental to the history and development of Maltings Cottage in Melton parish and, thus, I judge that the application site does not contribute towards the significance of the Cottage.

The existing character of the setting in the area of the application site is that of built form consisting of a series of linked volumes creating the impression of continuous development of predominantly, but not exclusively, modern appearance. The proposed development will retain the effect of built development within the setting of the Cottage, return it to predominantly residential use and preserve the important and established space and view to the immediate frontage of the Cottage which ensures appreciation of its significance. That the actual development introduces built form of a different use, architectural character and scale than that which exists is, in my view, incidental provided that its position does not impinge upon what I have, in effect, identified as a visual and spatial buffer to its frontage, which it does not.

For these reasons, therefore, I judge that there would be no harm arising from the proposed development within the Cottage's setting and that its setting would, thereby, be preserved. It is not necessary, therefore, to apply the tests in either paragraph 195 or 196 of the NPPF.

The significance of the late 18th century Grade II listed terrace at no.s 104-110 Thoroughfare to the south of the application site is derived from its historic origins, urban form, profile, materials and its position adjacent the principal route out of Woodbridge to Melton. It contributes to the same streetscene as the frontage buildings on the application site and allows the way in which this part of Woodbridge extended around and beyond the pre-existing terrace during the later part of the 19th century and early 20th century to be read. The townscape has continued to evolve around and within the setting of the terrace during the 20th century and this is inherent within its urban nature.

I judge that the principle of the redevelopment of the application site will not cause harm to the terrace's setting. The design of the development replaces built form with built form and restores the residential character of the site with gardens in proximity to the terrace. The development proposal, therefore, would represent a change in this part of the terrace's setting but I judge that the change would have no effect on the terrace's significance.

For these reasons, therefore, I judge that there would be no harm arising from the proposed

development within the terrace's setting and that its setting would, thereby, be preserved. It is not necessary, therefore, to apply the tests in either paragraph 195 or 196 of the NPPF.

4.4 Non-Designated Heritage Assets

As you know, I do not support, in principle, the loss of non-designated heritage assets. I introduced the criteria for identifying non-designated heritage assets that are buildings or structures, which were adopted and published by SCDC in October 2015. These have been used to ensure the conservation of heritage assets that would otherwise be lost, although identification does not prevent changes that can be undertaken using permitted development rights. It was the Council's view in providing its planning brief for its former office site that the two older buildings that sit at the front of the site should be retained and re-used. Consequently, as part of the pre-application process, we identified the two buildings as non-designated heritage assets in October 2016, which information is publicly available through the Council's website and using eGGP. The identification was made because four out of ten criteria were met by each building and, by having done so, we identified their significance at that time.

The greater the number of criteria met, the greater the significance.

The buildings were identified as non-designated heritage assets as both met the following criteria: aesthetic value; integrity; landmark status; and social and communal value. The white brick building which is the southerly of the two heritage assets, is a substantial late 19th century villa with a projecting eaves and slate roof with good survival of its original external joinery to the front. It exhibits a positive external appearance in the streetscene and retains a degree of intactness and lack of harmful alteration.

It derives its communal value from its civic role as part of the former seat of the local authority. The red brick building which is the northerly of the two heritage assets is likely early 20th century in origin and constructed for the Deben Rural District Council. The building is an impressive essay in the early 18th century classical revival style and retains much of its original joinery to the front. It exhibits a positive external appearance in the streetscene and retains a degree of intactness and lack of harmful alteration.

It derives its communal value from its civic role as part of the former seat of the local authority. Its scale and formal character contribute to its streetscene role as a local landmark, an attribute particularly visible on approach down Pytches Road.

It is regrettable that the current application is predicated on the loss of the non-designated heritage assets on the site rather than their retention and re-use (I do not include the former on-site air raid shelter, which has not been identified in this way). The NPPF states that heritage assets are an irreplaceable resource at paragraph 184 and that LPAs should, in determining planning applications, take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; and the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality (para. 192). Historic

England's 'Conservation Principles, Policies and Guidance' (2008) state that 'the fact that a place does not meet current criteria for formal designation does not negate the values it may have to particular communities. Such values should be taken into account in making decisions about its future...' (para. 81). It is also important to consider that "retaining and re-using existing buildings generally has a lower environment impact than replacing buildings in terms of embodied energy" (British Standard 7913:2013 Guide to the conservation of historic buildings – para. 5.3.1).

Paragraph 197 requires that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing the current application that directly affects two non-designated heritage assets, the decision maker will need to arrive at a balanced judgment having regard to the scale of any harm or loss and the significance of the asset. The two frontage buildings are not of very great significance – they are not designated heritage assets. However, they have met 4 of the 10 criteria for identification as non-designated heritage assets and are clearly of some local importance. Taking into account the significance of the buildings, therefore, it is my judgment that their complete loss would result in considerable harm. Loss of the buildings would not be mitigated by their recording prior to removal.

It is the role of the decision maker to strike a balance having regard to the scale of harm and the significance that I have identified, above. This will involve weighing up all of the various material considerations, positive and negative, many of which fall outside the scope of my comments here. It is a matter for the decision maker's judgment how much weight is ascribed to the considerable harm and the significance of the heritage assets that I have identified. Given the overall policy in the NPPF to conserve heritage assets in a manner appropriate to their significance because they are irreplaceable the decision maker will need to find positive factors in weighing the planning balance. I have identified, above, the outstanding quality of some aspects of the design of the proposed development and this is a positive factor. There may be many others that are identified in striking the overall balance. Provided that the decision maker, in arriving at their judgment of where the planning balance lies, has had regard to the scale of harm to and significance of the non-designated heritage assets that I have identified, then the terms of paragraph 197 of the NPPF will have been met.

Robert Scrimgeour

Principal Design and Conservation Officer

26th July 2019