

1 August 2011

The Planning Inspectorate
3/16 Wing
Temple Quay House
2 The Square
Bristol, BS1 6PN
Email - teamp1@pins.gsi.gov.uk

Dear Sirs

**Planning appeal Ref: APP/W3530/A/11/2155965/NWF by Greene King Plc
Erection of two dwellings and garaging with new access for dwellings and public
house (following blocking up of existing access) – Land adjacent Six Bells Inn,
Felsham (Ipa ref:0555/11)**

1. I am writing on behalf of the Suffolk Preservation Society ('The Society') in support of the refusal of planning permission for the erection of two dwellings within the designated conservation area of Felsham. The Society represents many thousands of individuals and hundreds of parish councils across Suffolk and seeks to ensure that new development serves to respect and reinforce local distinctiveness whilst conserving the significance of heritage assets.

2. The Society has considered the reasons for refusal given by the district council and reviewed the evidence submitted in support of their case by the appellants. In accordance with section 79(1) of the Town and Country Planning Act 1990, we request that the merits of the case are considered 'de novo' and not restricted to those matters given in the council's reasons for refusal.

3. In particular, the Society believes that the proposed development would have a demonstrably adverse impact upon the character and appearance of the conservation area contrary to the provisions of section 72(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990. In our opinion this 'harm' is associated with the introduction of significant built form into an undeveloped space that contributes positively to the character of the conservation area. Regrettably, Felsham Conservation Area does not have an up to date appraisal in conformity with recent English Heritage guidance (*Understanding Place: Conservation Area Designation, Appraisal and Management* (2011)). The Society considers that the appraisal adopted in 1996 is now outdated and of limited value given its superficial nature. A re-appraisal of the area would give greater weight to the contribution made by the spaces between development (settlement morphology). Paragraph 2.2.15 of EH's 2011 guidance highlights the importance of this issue. Paragraph 2.2.2 of *Understanding Place* (English Heritage 2010)

*states: "Character in the historic environment is a subtle compound of many ingredients
Layout: parcel (field or plot) size, shape and land use; regularity and density of street
pattern...positioning of buildings in relation to plots and sight-lines; building scale and
density, and their relationship to street width; and the size and, frequency and formality of the
open space."*

4. The historic morphology of Felsham is most apparent in the Second Edition OS Map of 1904. The street frontage development is clustered about the twin focal points of Upper and Lower Greens with a very limited number of high status buildings set more deeply within plots. The application site forms part of the countryside that permeates to the heart of the settlement. We find that inadequate consideration has been paid to this issue by the appellants in their evidence. In our opinion, the introduction of two substantial dwellings into this backland location would serve to harm the character of the area as this would serve to erode the historic morphology of the settlement by developing open space that contribute positively to the significance of the area designation. This harm would be compounded by the creation of a further access with generous visibility splays (2.4m by 60m in either direction) necessitating the loss of an important hedgerow and its replacement by hard surfacing (and probable signage) for the dwellings and new 'remote' access arrangements for the Six Bells car park. The historic view eastwards along Church Road towards Lower Green would thus be compromised. Furthermore, the appearance of the area would also be harmed in views from Upper Green, obtained between existing frontage development; where the proposed intensification of building density would be apparent.

5. The setting of the Six Bells public house is a statutory concern (s.66(1) 1990 Act). We note that the former service court has been much eroded by the loss of the majority of the former ancillary ranges that formerly defined a rear yard. The stopping up of the historic driveway and the creation of a visually divorced and serpentine access would further erode the historic layout of the site and thereby would serve to harm the significance of this designated heritage asset. Furthermore, the introduction of housing to the rear of the public house would further serve to suburbanise the setting of the listed building.

6. Whilst the Society does not claim to possess any particular technical expertise concerning highway safety matters; nevertheless it appears to us that the revised access position in much closer proximity to the junction of Church Road and Upper Green presents greater potential hazard to road users. This potential in combination with a mixture of domestic, customer and service vehicles using the proposed access could result in a significantly increased risk of accidents in our opinion.

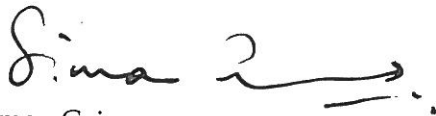
7. Whilst the design of the proposed dwellings is derived from generic vernacular precedents we find no evidence of a bespoke design response to this location. We have significant concerns that the amenities enjoyed by the cottage-scaled dwellings

fronting Upper Green would be significantly adversely affected by the proposed dwellings set in close proximity to their rear boundaries. In our opinion, the resulting relationship would be overbearing and intrusive. We believe this reflects the adverse impact identified upon the character and appearance of this part of the conservation area.

8. In conclusion, the Society respectfully submits that the proposals would result in significant harm to the significance of designated heritage assets contrary to HE.9 of PPS5: Planning for the historic environment, local planning policies CS5 of the Adopted Core Strategy and 'saved' policies SB2, GP1, HB1, HB8, H13, H15 and H16 of the Adopted Mid Suffolk Local Plan.

9. The Society would be grateful to receive a copy of the Inspector's decision letter in due course.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Simon Cairns', with a stylized flourish extending to the right.

Simon Cairns
MRTPI IHBC
Director

CC: John Pateman-Gee & William Wall, Planning Department, Mid Suffolk District Council, High Street, Needham Market, Suffolk IP6 8DL; Felsham Parish Council, Mr & Mrs M Zarych, Maple Cottage, Upper Green, Felsham, Bury St Edmunds, Suffolk IP30 0PL, Mid Suffolk Suffolk District SPS Chair