

Mr Philip Ridley  
Head of Planning Services  
Town Hall  
High Street  
Lowestoft  
Suffolk  
NR32 1HS

For the attention of Richard Amor

Dear Mr Ridley

**C/11/0468 Church Street, Wangford - Erection of two No. two storey houses**

1. I am writing on behalf of the Suffolk Preservation Society ('the Society') regarding the above application for the erection of two houses adjacent to the grade I Church of St Peter and St Paul in Church Street, Wangford. The Society has fundamental objections to the proposed development.

2. In formulating our response, the Society has visited the site and reviewed the planning history and in particular paid regard to the Adopted Wangford Conservation Area Appraisal. The Society refers you to our previous correspondence regarding application ref: for the erection of a single earth sheltered dwelling. Our letter dated 1 March 2010 specifically requested that any consent be subject to a Grampian condition to achieve the restoration of the site frontage to Church Street and its subsequent maintenance as an area of open meadow land, free from domestic paraphernalia and development that would detract from its openness. In our previous correspondence we stated *"We are particularly concerned to ensure that the 'blue' land is subject to an appropriate scheme of restoration and management, but excluded from domestic curtilage. The Society wishes to ensure that this area is retained as an open area of low key, agricultural character with reinforcement of the existing hedgerows and boundary planting. This area must avoid the introduction of domestic paraphernalia and planting as this would undoubtedly serve to harm the character and appearance of this part of the conservation area, having due regard to the Inspectors observations dated 1st December 2009."*

3. Our position regarding the previous scheme was based on an appreciation of the considerable contribution made by the application site to the significance of heritage assets including: the adjacent grade I listed parish church, Grade II listed Old Vicarage and finally the considerable positive contribution to the character and appearance of the conservation area. In our opinion, the submission fails to provide the essential analysis of the impact of the proposals upon heritage assets in conformity with PPS5: Planning for the historic environment. In particular:

HE6.1 Local planning authorities should require an applicant to provide a description of the significance of the heritage assets affected and the contribution of their setting to that significance

HE6.2 This information together with an assessment of the impact of the proposal should be set out in the application (within the design and access statement when this is required) as part of the explanation of the design concept. It should detail the sources that have been considered and the expertise that has been consulted.

HE9.1 There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be

HE10.1 In considering applications for development that affect the setting of a heritage asset, local planning authorities should treat favourably applications that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset.

4. In this case we find that no substantive analysis has been provided of the setting of the grade I parish church and the contribution made by the application site (contrary to HE6.1, 6.2, 9.1, 10.1 PPS5 above). As a grade I listed building this asset carries the greatest presumption in favour of conservation. We also find no analysis of the Old Rectory's setting and in particular, the degree to which intervisibility between the Old rectory and the parish church contributes to the significance of these assets and whether this would be prejudiced by the scheme. In our opinion, the scheme would detract materially from the setting of these assets and would consequently harm their significance without substantive justification contrary to national policy and statute (s.66 (1) PI (Lb & Ca) Act 1990)

5. In terms of the conservation area, we do not believe that the applicant has afforded adequate consideration of the contribution made by application site to the character and appearance of the area and the impact of the scheme. We note that the Adopted Conservation Area Appraisal identifies a series of important views across the site and designates the site as a significant green space. The Spatial Analysis section of the appraisal also notes the contrast in character between the opposing sides of Church Street. In our view the open nature of the west side of Church Street is one of the defining elements of the character and appearance of the area which it is desirable to preserve or enhance in accordance with section 72(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990. We fail to see how the proposals are compatible with this aim.

6. In terms of the detailed design, we find the pavilion on the site frontage wholly incongruous whilst the detailed landscaping proposals are fussy and contrived. The introduction of a formalised parking area behind the frontage hedgerow would potentially prejudice its well being and, during the winter months at least, introduce an alien and intrusive element into the street scene. In our opinion, the integrity of the frontage hedgerow is of importance. We do not believe that this hedgerow is as substantial as suggested by the accompanying drawings. As a consequence, any development on this site would have a significant presence in the streetscene. The proposed two storey dwellings would result in a material detrimental change in the character and appearance of the conservation area and would fail to preserve or enhance the character or appearance of the area.

7. In conclusion, the Society contends that the development is contrary to statute, national policies in PPS5, Core Strategy policies CS02 and CS17 together with Development Management policies DM02 and DM30.

Yours sincerely



Simon Cairns  
IHBC MRTPI

**Director on behalf of Waveney District SPS**