

10 September 2018

Mr John Pateman-Gee  
Mid Suffolk District Council  
Endeavour House  
8 Russell Rd  
Ipswich , IP1 2BX

Dear Mr Pateman-Gee

**DC/18/03592 Outline planning permission (all matters reserved) except the access point for the demolition of existing industrial buildings and construction of 149 dwellings, provision of public open space including playing fields, village greens, green corridors, community orchard, landscaping and surface water attenuation and associated works**

### **Former Poultry Processing Plant Haughley Park Haughley Stowmarket IP14 3JY**

I am writing on behalf of the Suffolk Preservation Society to register our objection to the proposed residential development on the former chicken processing plant at Haughley Park. The Society considers the proposed residential use inappropriate on two principal grounds. Firstly the site is inherently unsustainable being located significantly outside of the development boundary of Haughley. It is remote from the nearest village centre, lacks footpaths/cycle paths from the site and is located approximately 1.6km from a bus stop. The unsustainability of this location for a development of this scale is evidenced by the total absence of proposed affordable housing in the scheme.

Secondly the site is sensitively located adjacent to the Jacobean mansion which derives significance, in large part, from its formal gardens and naturalistic parkland setting. As a grade I listed building, Haughley Park is within the top 2% of designated heritage assets nationally and is therefore of exceptional importance. Whilst the existing industrial plant harms the setting of the mansion to some degree, the Society is of the strong opinion that the site's redevelopment to provide a large housing estate will cause greater harm by intensive urbanisation of the Park.

### **Principle of development**

We are aware of the stalled Haughley Park Position Statement which sought to restore the site to greenfield and to relocate the employment site to an alternative location outside of the Park. In principle, the SPS was highly supportive of this carefully conceived approach to better reveal the significance of the mansion and its setting. It is therefore a matter of deep regret that the applicants have abandoned this in favour of a speculative mass housing scheme, representing a missed opportunity to restore the wider setting of the listed house.

In this context the Society considers that it is entirely proper that the site has not been included in the Strategic Housing Economic Land Assessment (August 2017) for suitable sites for residential development, nor has it been included in the emerging Haughley Neighbourhood Plan as a potential residential site. Furthermore, the Mid Suffolk DC Annual Monitoring Report (July 2018) claims a 6.4 year housing land supply and therefore housing constraint policies carry full weight. In these circumstances a balanced planning judgement should conclude that this application must fail on the grounds that it is of an unprecedented scale in an unsustainable location that will materially harm the significance of an outstanding, highly graded heritage asset.

### **Impact on Haughley Park**

We note the pre-application comments by David Eve of Historic England, endorsed by your heritage team, which support the principle of redevelopment in terms of its heritage impact. However, we are concerned that the comments do not fully take into consideration the impact of the substantial increase in car traffic which will be using the shared drive. The magnitude of the proposed 149 dwellings is akin to a new settlement. This will result in a material intensification of the use of the drive, which runs immediately to the rear of the mansion, and which we consider will negatively impact upon it and its parkland setting.

The heritage assessment at para 4.39 states *There is a clear visual relationship between the main house and the factory buildings within the site. The current experience is that of the southern elevation of the house, comprising the end of the 17th century section and the 19th century stable/lodging section, which has a clear view of the factory buildings. Likewise, these sections of the house can be clearly experienced from in and around the factory buildings within the site (Images EDP 15 and 16). The factory buildings are also clearly visually dominant from the service road to the rear of the house (Image EDP 17).* Given this clear acknowledgement of the intervisibility of the mansion and factory site, it is inconceivable that the proposed housing estate will not also materially and harmfully impact upon the setting of the house. We note that Historic England specifically advised that the development should not seek to maximise views to the east towards the house. However contrary to this advice, the illustrative masterplan shows two terraces at the north east corner of the site facing directly towards the mansion and its formal gardens. It is also obvious that the small green buffer provided by the proposed SUDS and "upper green" will be insufficient to restore or even safeguard the setting of the mansion.

We acknowledge that much of the site is screened from the drive by a mature woodland belt and bunding. However, the masterplan indicates a significant extension of the development in a westerly direction on previously undeveloped land which extends beyond the hedge line and up to the woodland belt. In this way the scheme has a substantially bigger footprint than that of the former industrial plant. Even if the local planning authority were minded to support the principle of redeveloping this site for residential use, we consider that the large number of proposed dwellings is simply too great in this unsustainable location and will result in further significant erosion of the Park.

### **Summary and Recommendation**

In conclusion, the proposal is contrary to the spirit and aims of the Framework to deliver sustainable development and to look for opportunities to enhance or better reveal the significance of heritage assets (NPPF para 200). The redevelopment of this brownfield, unallocated, site to

provide 149 dwellings must be weighed against its wholly unsustainable location and the harm to the setting of Haughley Park. The NPPF makes clear that the more important the heritage asset, the greater the weight should be given to its conservation (para 193) and the opportunity to fully restore the setting of this grade I listed building is one that should be vigorously pursued.

For the above sound planning reasons we would urge that this application is refused.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Fiona Cairns', with a stylized flourish at the end.

Fiona Cairns IHBC MRTPI  
**Director**

David Eve, Historic England  
Ward Councillor – Rachel Eburne  
Heritage Team  
David Burn, Environment Portfolio Holder  
Haughley Parish Council  
Phil Butler - SPS Mid Suffolk District