

22 April 2020

Mr Charlie Bixby,  
Assistant Planning Officer,  
East Suffolk Council,  
East Suffolk House, Riduna Park,  
Station Road, Melton,  
Woodbridge,  
IP12 1RT

Dear Mr Bixby,

**DC/20/1144/FUL Construction of two dwellings  
Land Rear of Wingfield House, Market Place, Saxmundham, Suffolk**

I write on behalf of the Suffolk Preservation Society (SPS) regarding the application for a further two dwellings immediately to the rear of Wingfield House, a grade II listed building which is located within the Saxmundham Conservation Area. The SPS is pleased that Wingfield has a new owner that is committed to its restoration and we believe that the property has now been removed from the Heritage at Risk Register. However, we are concerned that the application lacks an appropriate level of supporting information and has the potential to cause heritage harm to the setting of Wingfield House and the character and appearance of the conservation area. Having considered the proposals, the SPS wishes to object to the proposals on the following grounds:

**Heritage Impact Assessment**

The application should be supported by a Heritage Impact Assessment, as required by para. 189 of the NPPF. This assessment should describe the significance of any heritage assets affected by the proposal, including any contribution made by their setting. In this case the HIA should assess the impacts upon the setting of Wingfield House together with the wider Saxmundham Conservation Area. Although the backland location will have implications for the likely wider townscape impacts of the proposals,, this is important information that is necessary to fully assess the cumulative impacts of the proposals on the historic environment when taken with the previous development that has been consented on this site.

**Principle of Development**

The application states that the proposals are justified by the magnitude of costs of restoring Wingfield House, and accordingly is presented as a case of enabling development. However, we note that in 2016, a year after the property was acquired, planning permission was granted for no.2

three storey dwellings immediately to the north of Wingfield House to address the substantial conservation deficit associated with the repair of Wingfield House.

Historic England's policy on Enabling Development (1999 and rebranded 2015) states that *Enabling development that would secure the future of a significant place, but contravene other planning policy objectives, should be unacceptable unless:*

*a it will not materially harm the heritage values of the place or its setting*

*b it avoids detrimental fragmentation of management of the place*

*c it will secure the long-term future of the place and, where applicable, its continued use for a sympathetic purpose*

*d it is necessary to resolve problems arising from the inherent needs of the place, **rather than the circumstances of the present owner, or the purchase price paid** (my emphasis)*

*e sufficient subsidy is not available from any other source*

*f it is demonstrated that the amount of enabling development is the minimum necessary to secure the future of the place, and that its form minimises harm to other public interests*

*g the public benefit of securing the future of the significant place through such enabling development decisively outweighs the disbenefits of breaching other public policies.*

It is disappointing that the application has not sought to explain how any of those tests have been met in order to justify the proposals. Furthermore, SPS considers that it is illogical to seek enabling development retrospectively. The purpose of enabling development is to secure the "future conservation" of a heritage asset (para.202 NPPF) and therefore is not relevant in this case as the restoration works have already been completed. The relevant test can be found at para.196 where if a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, *this harm should be weighed against the public benefits, of the proposal including, where appropriate, securing its optimum viable use.* In this case the public benefit of securing the repair of Wingfield House has already been achieved and therefore no weight should be given to this benefit when considering the impacts of the proposed two dwellings on its setting.

The site is very constrained and the proposals will further erode the garden of Wingfield House and could materially impact upon its setting and deny it, in large part, of its curtilage. This in turn could negatively impact upon its ability to secure a sustainable long-term use. In the opinion of the SPS, developing a substantial part of the plot may, far from securing its *optimum viable use*, reduce the long-term viability of the designated heritage asset as a desirable place to live or work.

## **Detailed Design**

The dwellings have been designed in a simple, pared back contemporary style, which can work well in a historic context where there is a multiplicity of architectural styles in close proximity to each other such as this. However, we consider that no.2 one-and-a-half storey dwellings will result in a very cramped development with minimal amenity space or outlook, contrary to the principles of good design set out in the National Design Guide (October 2019).

## **Conclusion**

We strongly urge that a Heritage Impact Assessment is produced by a qualified heritage professional to fully assess the impacts on designated heritage assets. If the local planning

authority is minded to support the principle of development, we suggest that revisions are sought to materially reduce the scale of development both in terms of the number and height of units proposed.

We trust that you find these comments helpful in the assessment of this case and request that SPS is consulted on any amendments to this application.

Yours sincerely,

**Fiona Cairns IHBC MRTPI**  
**Director**

Cc:

Ward Councillors

Robert Scrimgeour Principal Design and Conservation Officer ESDC

Saxmundham Town Council