

29 June 2020

Mr Grant Heal
Planning Officer, East Suffolk Council,
East Suffolk House, Riduna Park,
Station Road, Melton,
Woodbridge,
IP12 1RT

Dear Mr Heal

DC/20/1929/FUL Demolition of existing bungalow and outbuilding, and replacement with new detached bungalow

42 Chapel Street Woodbridge IP12 4NF

I write on behalf of the Suffolk Preservation Society (SPS) regarding the application to demolish the Victorian single storey cottage and replace with a single storey two bed, detached dwelling. SPS objects to the loss of the heritage asset and the proposed redevelopment which will result in harm to the character and appearance of the Woodbridge Conservation Area.

The cottage is a simple single storey agricultural worker's dwelling associated with the market garden industry in Woodbridge dating from the late 19th century. It forms a pair with No. 44 Chapel Street and map regression carried out by Brighter Planning illustrates that the cottages originally sat in a much larger plot, presumably orchards, while later maps show the presence of nearby glass houses. Such examples of our humble heritage have an historical significance as a window into a previous industrial and social way of life that is now lost. Therefore, the fragility of these simple structures makes them arguably more precious as a record of our social history and even more worthy of protection and conservation.

The Woodbridge Conservation Area Appraisal properly identifies this structure as *significant* and located within an important open green space in the conservation area. The cottage makes a positive contribution to the conservation area and therefore its demolition would result in harm. There appears to be a consensus between the lpa and the applicant that the cottage is sufficiently architecturally and historically significant to be considered as a non-designated heritage asset. Accordingly, the relevant test is set out in para 197 of the NPPF which requires a balanced judgement regarding the scale of loss and the significance of the asset.

The Society disagrees with the assessment that the level of harm resulting from the demolition of this structure will be low or 'less than substantial'. The Society considers that the total demolition of the cottage should be judged to be substantial harm and that the significance of the cottage has been materially undervalued and is considerably higher than the applicant's heritage assessment suggests.

The Society does not agree with the applicant's Heritage Assessment that judges the contribution that the building makes to the conservation area as limited on the grounds of its poor structural condition, its limited visibility in the public realm, its architectural simplicity and the fact that it is not listable. In this case the Society does not accept that these factors necessarily justify demolition of this heritage asset.

It is also notable that the application fails to provide any meaningful justification for why the structure is incapable of conservation and refurbishment. The rudimentary structural assessment concludes that the restoration and re-use of the building is not viable yet fails to evidence this assertion with a schedule of repairs and associated costings. Therefore, the Society considers that this claim should be given very limited weight. Moreover, the NPPF at para.191 makes clear that the deteriorated condition of a heritage asset should not be taken into account in any decision.

With regard to the proposed replacement dwelling, The Society notes that it is materially larger (approx. 30%) than the existing dwelling and significantly erodes the open space that has been identified within the conservation area appraisal as a characteristic which contributes to the character and appearance of the conservation area. While the stripped back architectural character of the proposed dwelling is not unprecedented in Woodbridge, the Society does not consider that it is of sufficient architectural quality to outweigh the loss of the heritage asset and the harm that will result (NPPF para 200).

The Society considers that the proposals fail the statutory tests set out in S72 of the P(LBCA) Act 1990, national policy set out at para. 197 and local policy set out at AP236 and emerging policies SCLP11.5 and 11.6. For the above sound planning reasons, we object to the proposals and urge that the application is refused. We trust you will find these comments helpful in your consideration of the application and request that SPS is consulted on any amendments to this application.

Yours sincerely,



Fiona Cairns IHBC MRTPI
Director

Cc:
Ward Councillors
Design and Conservation Team ESDC
Woodbridge Town Council