

suffolkVIEW

The magazine of the Suffolk Preservation Society



TIME TO PUT NATURE FIRST

The entire planning system needs to be restructured by placing the survival of the planet centre stage

The importance of the natural environment on not just our well-being, but on the very future of our planet, is increasingly recognised and accepted. *Ralph Carpenter Dip Arch RIBA* explains why we should be planning for a future which promotes the natural world and how this can be achieved. Ralph is an architect based in Suffolk who has been heavily involved in research and development of deep green architecture. His work in low impact design is a particular specialism and he is a current SPS trustee.

Suffolk County Council has declared a climate emergency, committing to achieving zero carbon by 2030 and the two areas identified as bringing the fastest gains are buildings and transport.

Planning regulates both of these areas. So how should the planning system respond to this challenge?

The Economics of Biodiversity; The Dasgupta Review, published on 02.02.21, states that 'we must conserve and restore our natural assets if we are to survive on planet earth. This includes empowering citizens to make informed choices and implement change by balancing what we take with what we give back.'

2020 was the year of the global Covid19 pandemic. It shone a very bright light on our poorly designed world showing it as mean on access to nature, mean on energy efficiency and mean on space.

[Page 2 >](#)



Cut Your Cloth

realism as to the battles the SPS can fight

[Page 8 >](#)



Dark Skies

is light pollution reducing our enjoyment?

[Page 12 >](#)



High Street Havoc

more challenges ahead for shops?

[Page 16 >](#)

Plus in this issue

Planning Overview

a round-up of planning issues and campaign work

[Page 5 >](#)

Our Year in Lockdown

a review of our planning achievements

[Page 10 >](#)

Suffolk Spotlight

news and views from around the county

[Page 18 >](#)



Fiona Cairns

Director, Suffolk Preservation Society

Welcome to our spring edition of Suffolk View which comes at the end of one of the most difficult years in living memory. But with brighter prospects ahead, there is much to reflect upon.

We have learnt over the last year how important nature and the environment are for our health and wellbeing. Climate change is making us face the need for our homes to be designed in a way that is more energy efficient, better connected, less reliant on fossil fuels and more adaptable to changing patterns in how we live and work.

The last 12 months have shown us that there is a future that relies less on commuting, more on digital connectivity, a proper understanding of the value of being in nature and even a rediscovery from our fathers and grandfathers of a love of growing our own food. We have learnt that we must adapt and it is time for those delivering the homes of the future to do the same. Our trustee Ralph Carpenter, considers nature-based solutions in housing delivery in his article at page 1.

While many charities have been limited in delivering their charitable objects as a result of the lockdown, here at SPS we have been busier than ever, see Our Year in Lockdown at page 10 which highlights some of our wins together with Planning Overview at page 5 for a full round up of our planning casework.

The increase in our workload is reflected in the size of our magazine as there is so much that we are pleased to share with you, and we are grateful to all the contributors in Spotlight at page 18 who enrich the magazine with updates and opinions from across the county.

We join many others in celebrating the defeat of the mutant algorithm devised to calculate housing numbers that would have disproportionately impacted on the countryside, see the Chairman's column at page 4.

The Energy Gateway continues to roll inexorably forward and Scottish Power Renewables (SPR) applications for two windfarms off

the east coast are approaching the end of their Examination, while further last-minute rounds of consultation by EDF have also been ongoing in recent months.

Our chairman represented the Society at the SPR Issue Specific Hearing relating to Landscape and Heritage at the end of last year. These complex and highly technical proposals involve a level of resource and skill that few local civic societies can hope to deliver.

Our President, makes a clear-sighted call for realism at page 8 which seeks to frame the current situation and define the challenges that communities are having to face.

The pandemic has also presented terminal changes to our high streets with a massive shift to online retail. This is most starkly illustrated by the closure of Debenhams in Bury St Edmunds and Ipswich. The Government is consulting on relaxing further the planning rules to permit shops to change use to residential, even in conservation areas. The Director reflects on the risks and opportunities in her article at page 2.

Our love of the everyday, humble architecture that provides the backdrop to our lives is celebrated in the form of Local Lists, buildings that aren't of national but local importance and contribute to what makes our high streets, towns and villages individually distinctive. Some of the highlights of Suffolk's local lists are considered by Elizabeth Coughlin in her article at page 14.

Due to uncertainty of dates relating to the easing of lockdown, prior to going to press, it has been decided to defer the 2021 AGM until late summer/early autumn this year, in the hope that we can meet in person rather than virtually.

We hope you enjoy this edition which reflects many of the most relevant changes that our county is facing. We hope that you will also consider our appeal for new members at page 11 and consider introducing a friend. Like many charities, we have had a tough year and we would really value a little extra help.

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Time to put nature first

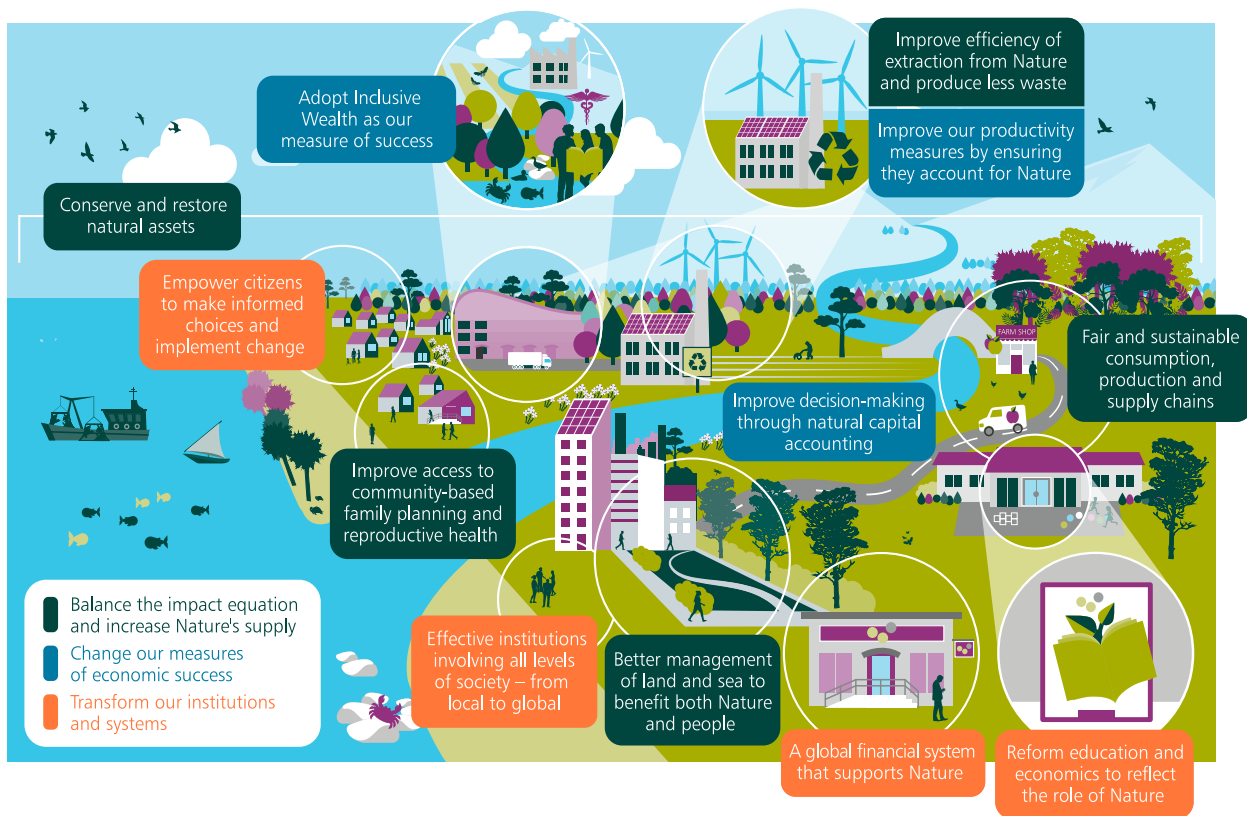


Why have we allowed this to happen? Perhaps it goes back to the notion of paternalism which has stripped away individuals' ability to provide for themselves (self- and custom-build) and instead given them the minimum to get by on, a far cry from Prof Dasgupta's call for the empowerment of citizens to make informed choices. In today's climate that paternalistic role equates to planners and developers taking almost universal control of housing provision leaving the individual with very little ability to influence the outcome and to put nature at the forefront of the plan.

But there are other ways of planning for a future which cares for the natural world and humanity. And it has to show hitherto unimagined generosity.

This new model must put nature first, starting with the presumption that nature always has first call. What we then take from nature to





Top left
Green infrastructure running through a site. Grey to Green scheme, Sheffield Photo: Nigel Dunnett

Top right
Summary of Options for Change – Figure 21, The Dasgupta Review. Dasgupta, P. (2021), The Economics of Biodiversity: The Dasgupta Review. Abridged Version. (London: HM Treasury).

Bottom left
Solar housing - Solarsiedlung at Freiburg, Germany By Andrewglaser at English Wikipedia, CC BY-SA 3.0

Bottom middle
Freiburg, Germany

Bottom right
Food growing integrated within the residential areas – Clay Fields, Elmswell. Photo: Mikhail Riches copyright Tim Crocker

create our world must then respect the principle of the circular economy (cradle to cradle) and ensure that the way we live gives back as much to our planet earth as we take from it.

Chilton Woods in Sudbury, a major new development with 1100 houses, is currently going through the planning process and will be developed by Taylor Wimpey. The concept of nature first, had it been around ten years ago, would have led to a completely different masterplan and it is no coincidence that the Suffolk Preservation Society and a number of other local groups are pushing hard for this change of direction.

The Chilton Woods development impacts on our ability to provide food and shelter on the site at the same

time as leaving space for nature. If the principle of nature first had been given the urgent priority it required for humanity to survive, green infrastructure would have been the golden thread running through the site. The 50% of green spaces specified as part of the masterplan would have been the backbone of the layout, available to all who live on and around the site, and not pushed away to the margins. Access to nature for all in equal measure, access to food growing areas, and an emphasis on productive fruit and nut trees would have been the starting point. These would have been spread throughout the site.

From here, routes through the site and areas for housing and commercial uses would be slotted in, always looking to

the future and reducing their impact on nature.

Energy and water would be captured on site, with solar panels, large water storage areas doubling as wildlife friendly ponds, and managed woodland with firewood production for on-site use. Food growing areas near housing reinforce the connection to nature.

Travel around the site and into Sudbury be based on electric bikes and cars, car clubs and significant reductions in roads to drive down resource use and the site's carbon footprint. Hard surfacing would primarily provide access for deliveries and emergency services into the heart of the site and cars would be stored (not parked) in compact lots with automated retrieval systems ensuring that nature could still dominate.

Continued on Page 4 >





Andrew Fane OBE

Chairman, Suffolk Preservation Society

In the midst of the storm ...

Last August the Prime Minister announced a root and branch review of the whole planning system that had evolved progressively from 1947. He said that the time had come “to tear it down and start again”.

Perhaps unsurprisingly many planning experts did not agree with this bleak assessment. Indeed, the fine glossy brochure that accompanied this ‘crack of doom’ for the established system contained over 20 handsome photographs of regeneration and beautiful recent examples of major developments around the country, many involving heritage areas and listed buildings - all produced under the very regime the PM so vigorously condemned.

Lord Carnwath - the most senior and experienced planning judge in the country right up to Supreme Court level - wrote in October “*in my experience of 50 years the planning system is soundly based and in general it has served us well, but has not been assisted by frequent changes of policy direction. Radical reform - the White Paper does not begin to make a case for it*”.

Many others took strong public exception to aspects of the proposal and the House of Commons gave a ‘hair-drying’ to the Local Government Secretary Robert Jenrick, with many of their arguments fed by CPRE, the sister body to the Suffolk Preservation Society. The initial proposals included an algorithm (remember them awarding exam results last summer - briefly if disastrously) designed to allocate locations for new housing right across the country, with the clear effect of slashing house building in the deprived North East of England and increasing it dramatically in our county and most of the highly developed South East - hardly consistent with levelling up. Mercifully this algorithm has been abandoned.

But it would be unfair to pretend that the Government proposals are all bad. We at SPS welcome the newly stated emphasis on beauty in design,

a word that has been hushed out of planning for a generation. All credit to ministers for noting that where developments are beautifully designed, they are welcomed by most and then usually go on to be successful. SPS has argued for good design throughout this same generation.

Unfortunately, the proposals also invent a way to evade local democracy in the planning process by first declaring designated zones for development. Local scrutiny by councillors and residents would be frozen out of individual decision making thereafter and developers would gain free rein to build within those zones, regardless of impact on local settings, or conservation areas or even historic buildings. Local people always demand their say in the way consented plans impact their neighbourhood and this proposal would take that away for the first time. That change would infuriate many, as Simon Jenkins so eloquently points out in a recent edition of Country Life.

Perhaps this a classic case of over-enthusiastic reform of a perceived problem that planning professionals at all levels cannot see. What SPS calls for is carefully considered and step-by-step enhancements to the existing imperfect but largely sound system, rather than a headlong rush into new rules that those professionals see as very damaging to a system that has done much good for the last 75 years.

In short, in answer to your first consultation question, my three-word description of the present system would be: robust, but over-cluttered, and under-resourced.

The aim should be to build on the strengths of the existing system, reduce the clutter, and ensure adequate resources, in terms of finance and personnel; and above all to provide a period of policy stability to allow the reformed system to be settle down and gain public understanding and confidence.

Lord Carnwath

< Continued from Page 3

Time to put nature first



Managed woodland producing firewood for use on site

Buildings would be designed for modern needs, open plan, with space for home working, children’s study areas, and easy level access out into nature. Zero carbon construction would have been the driving force behind building design with a presumption in favour of better than zero carbon and healthy natural materials sourced locally. High carbon concrete and steel would not be used other than in exceptional infrastructure works.

Self and custom-build managed by locally inspired community groups, guided by the Local Authority as the principal land owner would be the delivery mechanism, with an emphasis on permanence, resilience, good quality construction, minimal defects, and durability. Community buildings, and places of work would be integrated into the layout rather than segregated into zones making walking or cycling a realistic option.

And all this at an affordable cost and a minimal environmental footprint. It is being done in isolated pockets in this country and more widely in Europe. With a little leadership from the County Council, it could be happening in Suffolk. Only if we have this vision will we thrive.

Notes:

Suffolk County Council
Climate Emergency Declaration

suffolk.gov.uk/planning-waste-and-environment/initiatives/our-climate-emergency-declaration/

The Economics of Biodiversity:
The Dasgupta Review

gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review



Bethany Philbedge

Planning Officer, Suffolk Preservation Society

Planning Overview

Update and comment on planning issues

For details on all SPS's planning campaign work, see our monthly bulletins available on our website at

suffolksociety.org/about/our-publications/monthly-bulletin

POLICY

CPRE, SPS's sister organisation, is part of a planning alliance of 18 organisations which has released a joint planning coalition document entitled 'Vision for Planning'. This is in response to the Government's White Paper on Planning Reform and calls for a rethink on major elements of the controversial planning proposals by launching an alternative version.

It urges the Government to work more with stakeholders to deliver a planning system that puts people, climate and nature at its heart, rather than the current proposals which will further reduce public participation.



"CPRE is asking us to think again about planning but I don't remember thinking in the first place."

The Vision of Planning can be read at

cpre.org.uk/resources/joint-vision-for-planning-2021 >

HERITAGE

East Suffolk Council has produced a draft **Historic Environment Supplementary Planning Document** which covers a range of topics including conservation areas, listed buildings and non-designated heritage assets, sustainable construction and renewable energy. Technical guidance is given on making changes to historic buildings and development within their setting, and also about maintenance and repair of historic buildings. It includes specific guidance about shopfronts and historic parks and gardens which form part of the varied heritage of East Suffolk. SPS welcomes the document and was pleased to give comprehensive feedback on a number of specific technical and policy related points.

opportunity to secure a sustainable use for the heritage asset and the design of the dense development of new dwellings to the rear of the property raises concerns. Such short-term thinking over this important building is a matter of real regret.

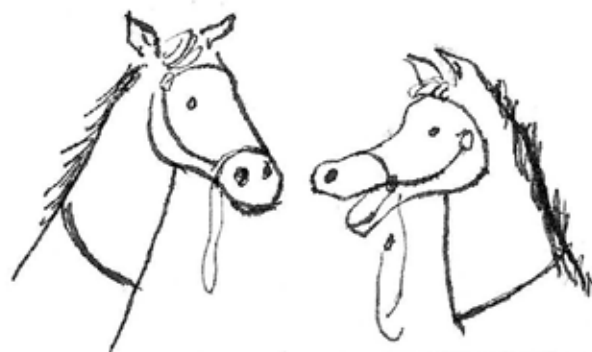
In contrast, SPS welcomed the decision by West Suffolk Council to refuse an application for the redevelopment of a brownfield site in the centre of **Newmarket** that formed part of the **Queensbury Stables**.

Whilst SPS supported the reuse of this town centre site for housing, the Local Plan had identified the site for enabling development to fund repairs for the listed **Queensbury Stables** which is currently on the buildings at risk register, in a very poor structural condition and without a use.

The proposals specifically excluded the derelict buildings and the possibility of funding the repair of these important heritage assets would have been lost if approval had been granted.

Such short-term thinking over this important building is a matter for real regret

The recent decision by East Suffolk Council to approve works to **Lowestoft's grade 2 listed Post Office building**, however, was disappointing. The failure of the scheme to include the upper floors was a missed



They wanted to develop near the racing stables, but we said 'Neigh.'

Planning Overview

DESIGN

Housing Secretary, Robert Jenrick, has announced proposals to change the **National Planning Policy Framework** to place a 'greater emphasis on beauty and placemaking'. This, together with a draft **National Design Code**, is in response to the 2020 Building Better, Building Beautiful Commission's report *Living with Beauty*. The National Design Code will provide a checklist for new developments and form the foundation of local design codes which, Jenrick states, 'will enable local people to set the rules for what developments in their area should look like, ensuring that they reflect and enhance their surroundings and preserve our local character and identity'. The proposed changes to the NPPF include

the word 'beauty' for the first time and a requirement to refuse development that is not well designed.

This edition's article on putting nature first (page 1) makes a reference to the forthcoming **Chilton Woods housing development at Sudbury**. SPS has long supported the development of this site and indeed Taylor Wimpey's outline scheme declared the intention for it to be an exemplar scheme for the future in terms of addressing climate change. We therefore approached the consultation on the draft design code for the scheme with interest. Ultimately, though, we were disappointed that it missed opportunities for a more innovative approach to delivering large housing estates. There was

an overreliance on vernacular precedents rather than on imaginative or sustainable design. The use of old technologies would not deliver the green-led agenda that the development should aspire to, and the open space was relegated to the margins of the development site. SPS was further disappointed that a planning application for infrastructure plans quickly followed before the applicant had considered responses to the design code consultation. SPS continues to push for improvements to the scheme but is concerned that the timing of the infrastructure application demonstrates a disregard of the importance of community involvement in the design process.

“enable local people to set the rules for what developments in their area should look like, ensuring that they reflect and enhance their surroundings and preserve our local character and identity”

ENERGY

The Government's aim for net zero emissions by 2050 is fuelling an increasing number of renewable energy projects, not least those for **solar power** generation. SPS supports solar energy in principle – the use of rooftops, brownfield sites and smaller community projects to generate electricity is surely supported by most. However, we often have concerns regarding the size, location and proposed mitigation on offer from the large development companies. SPS judges each proposal on its merits and we have supported proposals such as those on the Euston Estate located close to RAF Honington which are well screened within the landscape due to topography and existing hedgerows and trees.

In contrast to these, the proposals for a 500MW solar farm on the Suffolk/Cambridgeshire border being brought forward by Sunnica will, if built, be the largest solar farm in Europe. SPS responded in detail to a consultation challenging the adhoc approach to site selection which has resulted in a series of poorly related greenfield sites totalling approximately 2700 acres which fail to relate successfully to the existing

landscape. Like many others, we are concerned by the loss of agricultural land, which is currently used for food production, but also by the significant change to the landscape. Solar panels and associated infrastructure and perimeter fencing will flank either side of well used public footpaths, be highly visible from highways and encroach on a number of villages. SPS has called for more details regarding screening planting, a detailed layout, and an appropriate environmental and community fund to compensate those communities which will be impacted.

The proposals for a 500MW solar farm on the Suffolk/Cambridgeshire border being brought forward by Sunnica will, if built, be the largest solar farm in Europe.

At the time of writing the Public Examination for **East Anglia One (North) and East Anglia Two windfarms** continues. Throughout the process, SPS has maintained its strong objection to the choice of Friston as the location for the substation infrastructure to support the offshore turbines. Disappointingly, East Suffolk Council changed its position from one of 'objecting' to a 'neutral stance' due, in part, to the limited changes secured to the design of the substation site and 'an enhanced package of mitigation and compensation'. SPS remains unconvinced that the serious landscape and heritage harm to the Friston area is capable of effective mitigation.

SIZEWELL C

A decision on whether Sizewell C will be constructed was further delayed before Christmas by EDF submitting a further raft of documents, triggering an additional round of consultation before the Public Examination. This was just weeks after Registered Parties had submitted their written representations to the Planning Inspectorate. The changes were extensive, totalling 15 separate areas including changes to the freight strategy and variations to the scheme as a result of survey work

being completed at an advanced stage. SPS responded to the consultation and joined local residents and campaign groups in stating that it was unreasonable for EDF, after 10 years preparing this scheme, to make significant adjustments after the Development Consent Order application had been submitted. The first of the preliminary hearings is due to be held on the 23rd March.



"These documents are very late, but they are in good time for Sizewell D."



Given that the Public Examination process is yet to begin, it is alarming to read national media reports which suggest that ministers are already minded to give the go ahead to Sizewell C. The Wylfa nuclear project on Anglesey seems unlikely to proceed as developers and backers have pulled out and Inspectors' advice to government was to not go ahead due to damage to wildlife, air quality, design, tourism and socio-economic concerns. However, despite Secretary of State Alok Sharma's statement in reference to Sizewell C "We are starting negotiations with EDF, it is not a green light on the construction", alterations to the Sizewell B

site in order to accommodate Sizewell C have already been approved by East Suffolk Council. These included permission for the felling of Coronation Wood which has sadly now been completed by EDF, despite attempts by local residents to reverse the decision. Earlier this year, SPS joined a number of groups in inviting Business Energy Secretary Kwasi Kwarteng to visit the Suffolk coast to see the protected habitats that surround the Sizewell C site, the Area of Outstanding Natural Beauty and the fragile, eroding coastline. Unfortunately, the invitation was declined by the Minister's office.

AREAS OF OUTSTANDING NATURAL BEAUTY

Two applications for campsites within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty at Ramsholt and Reydon have been brought to the attention of SPS in recent months. These demonstrate the difficult balancing act that planning considerations and decisions often need to address. There is no doubt that tourism plays a vital role in the economy of the area and that developments which support this industry should generally be encouraged. Moreover, access to the countryside, nature and beautiful places has a proven beneficial impact on our well-being. On the other hand, development to allow more people to stay in these areas, unless very carefully located and

managed in terms of scale, lighting, traffic and noise could actually threaten the tranquillity, dark skies and visual qualities of the landscapes which lead to their designation.

These are special places to many people which is borne out by the number of letters both supporting and objecting to each proposal.



"You would think that an AONB would have better weather than this."



Geoffrey Probert DL
President, Suffolk Preservation Society

We must cut our cloth according to our purse

The President adds his voice to the calls for realism as to the battles the SPS can fight

For nearly a century the Suffolk Preservation Society has campaigned for the protection of Suffolk's wonderful heritage of buildings - saving many from demolition, others from mindless adaptation and yet more from encroachment by inappropriate development.

And in our battles, we have a long pedigree of success - resting these days on a small but talented team of planning professionals known and respected by the local planning authorities.

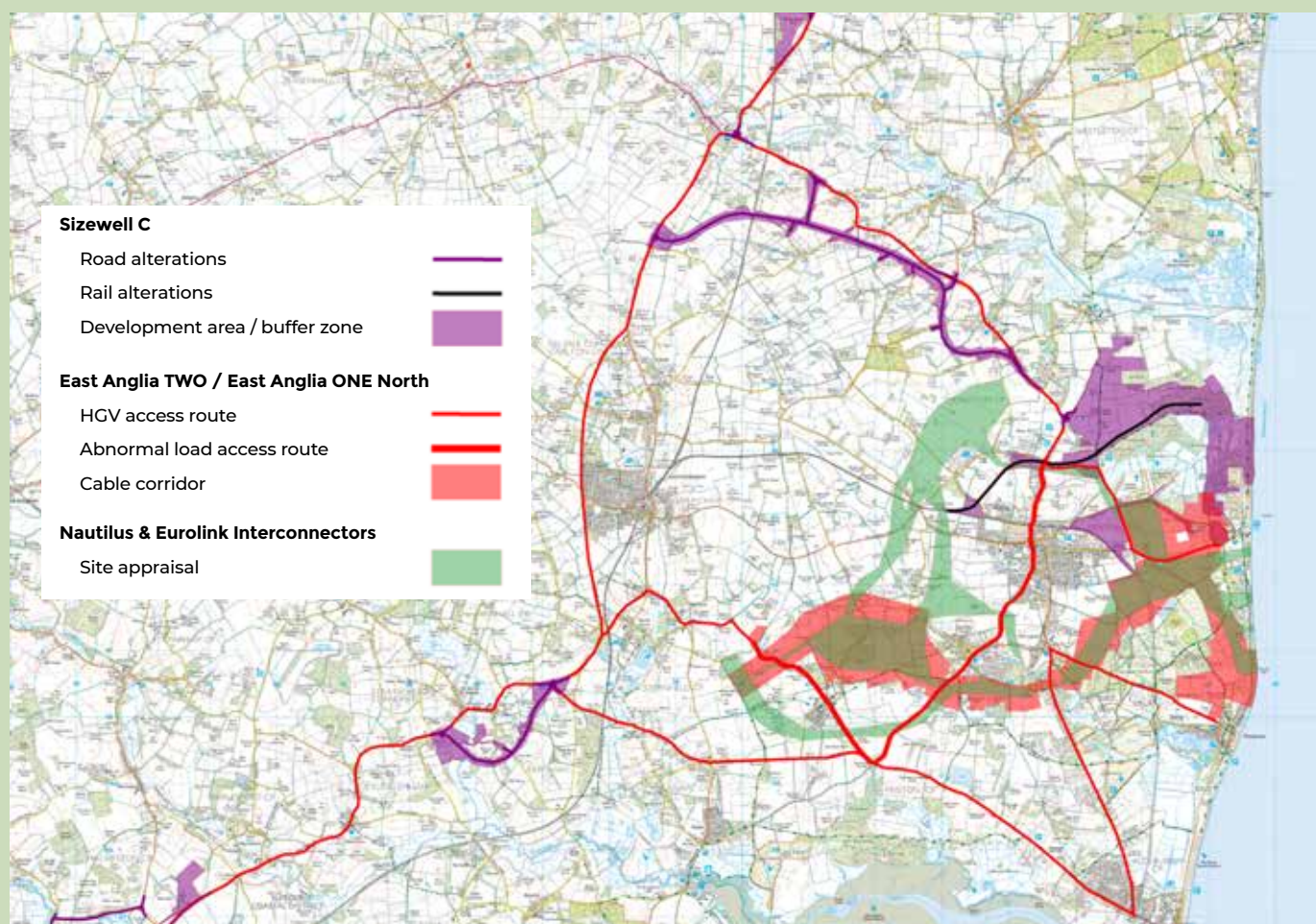
But now Suffolk faces not only the challenges of mass housing development but

also the transformative consequences of the UK's Green Energy revolution – wind, sun and nuclear. The prevailing axis that in the past powered the nation was north/south as the power from coal fired stations in the north was brought south.

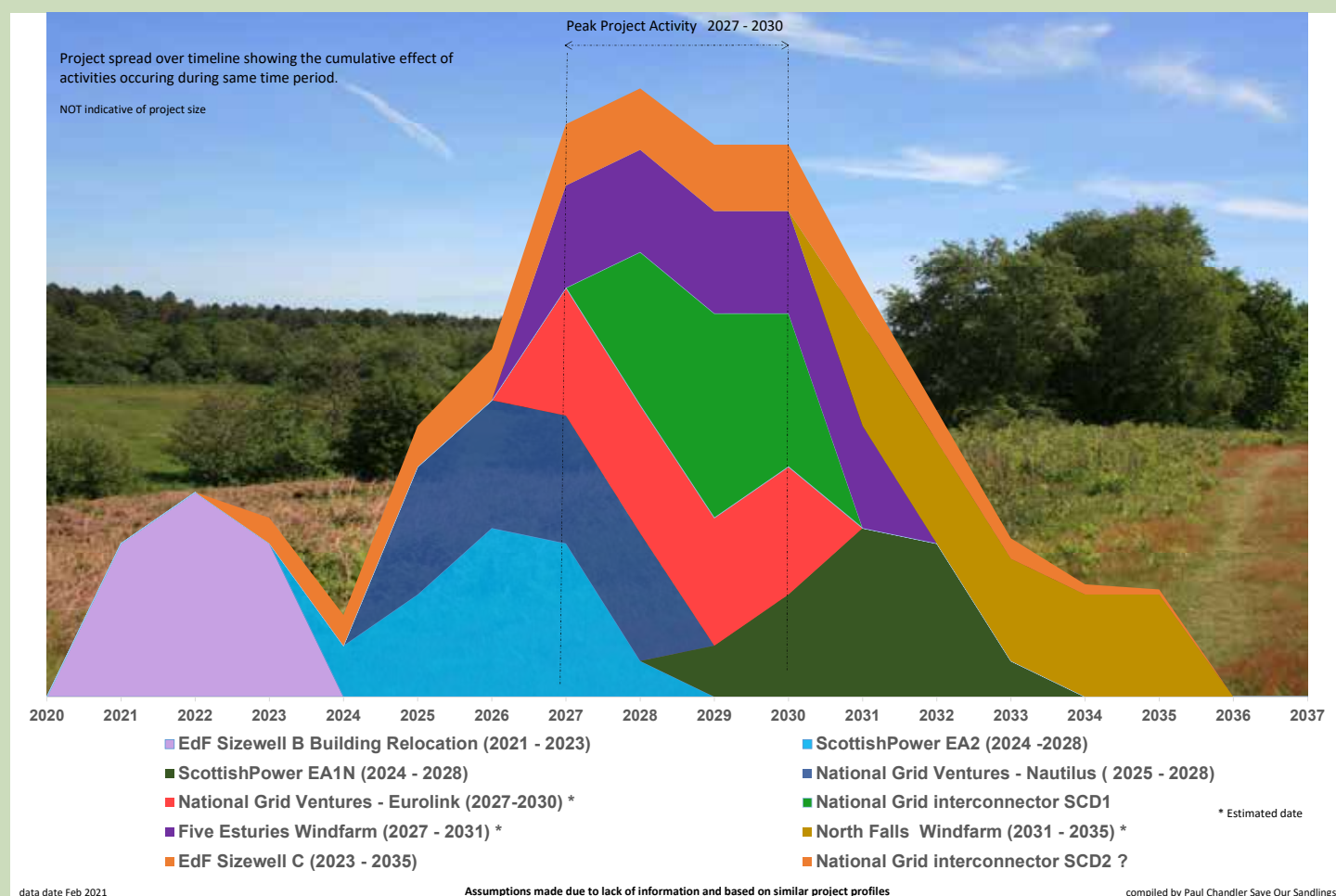
Now power also needs to go east/west from what is rapidly becoming one of the world's biggest concentrations of offshore wind farms in the benign shallows of the North Sea. Here, a veritable forest of turbines will cover an area of sea the size of Norfolk with the consequence that Suffolk is caught between the source of the new energy and

London/the Midlands where the energy is needed. This brings with it a mounting series of looming applications for huge onshore infrastructure– including convertors and interconnector stations on the Suffolk coast linking the UK and the Continent, designed to reduce intermittency issues inherent in wind power.

Secondly, current national policy is calling for a new generation of nuclear, putting Sizewell C back on the agenda, the building of which – if authorised - could trigger a very great strain on our county's road infrastructure.



The extent of the current and proposed NSIPs in East Suffolk by kind permission of Substation Action Save East Suffolk (SASES)



Energy projects East Suffolk cumulative graph by kind permission of Save our Sandlings (SOS)

“ I am aware that by engaging in a full-frontal mega battle on any one of these projects, we could drain every last ounce of the SPS’s resources and budget. ”

Thirdly, given Suffolk’s dry and warm climate, we are attractive for the new generation of ever larger solar farms.

These national infrastructure project proposals understandably raise very strong local emotions and resistance, whether it be the substation complex at Friston (bigger than Sizewell A&B) or the Sunnica solar park spread over 2,700 acres round Freckenham in the west of Suffolk (the biggest ever in the UK). Not surprisingly local resistance groups turn to the Suffolk Preservation Society to live up to its name to help them fight their corner.

But these projects are of a quite different order and scale to the Society’s traditional battles. The former involves Government policy, energy giants with millions of pounds at their disposal and planning inquiries with paperwork running into thousands of pages. These kind of vast infrastructure projects have spawned the advent of NSIP (Nationally Significant Infrastructure Project) consultancies who have the depth of resources and the specialist skills to fight for or against them.

Hence my belief that we need to be realistic about what we, as a small charity can do.

In short, I am aware that by engaging in a full-frontal mega battle on any one of these projects, we could drain every last ounce of the SPS’s resources and budget. We would do this, of course, at the expense of those seeking our support in other causes and other parts of the county.

So, my guidance is that the role of the SPS should be to

- **acquit our longstanding role of campaigning for the protection of Suffolk’s wonderful heritage of buildings**
- **play a supportive role in the battles over national infrastructure by signposting the local pressure groups (who often have much deeper pockets than ours) to the best specialists and where we have relevant expertise vet and endorse those specialists’ reports. But not to be centre stage with all the resourcing conflicts that would bring.**

The romantic side of me sees the SPS as a David successfully felling multiple Goliaths: the realist in me tells me we have to cut our cloth according to our purse.

Which of course does not preclude us from being vocal in lobbying for those things we believe in

- 1 *that housing development should be proportionate, well sited, well designed and preferably on brownfield land*
- 2 *that industrial/energy buildings should be low, well sited and with effective landscape mitigation*
- 3 *that there should be joined up thinking so that green energy is delivered in a green way*
- 4 *that the UK should adopt the offshore ring main option to take wind power from the North Sea along the seabed to land closer to where it is needed rather than using Suffolk as a transmission corridor*
- 5 *that if Sizewell is built - if it must be built- it should be principally from the sea and by rail rather than by road and a proportionate compensation package be provided specifically for Suffolk’s cultural heritage*
- 6 *that solar farms be sensitively sited where they are visible from few viewpoints with effective landscape mitigation*

It is a hard balance to strike and I fully support the chairman, trustees and director in their task of upholding the grand traditions of the SPS without imperilling its very existence by pouring all our limited resources into one or other of these mega battles.

Locked down, but not locked out

A review of our planning achievements over the last 12 months

Many charities have found that the COVID19 pandemic has imposed restrictions on their work and the extent to which they can deliver their charitable objectives. Whilst it is true that the Suffolk Preservation Society's parish council training, social events and fundraising work have been severely impacted, our planning work has continued unabated. Not only have we been able to provide more planning help and support to our members than ever before but we are especially pleased that there have been some positive outcomes.

In 2020, the SPS responded to 75 major or controversial planning applications, submitted 10 Nationally Significant Infrastructure Project responses and 19 policy consultations ranging from neighbourhood plans, emerging district local plans and government consultations including energy and changes to the planning system. Through our responses we worked hard to ensure that planning applications and emerging planning policy safeguard the historic environment, create high quality places and new development in the right locations to protect the special qualities of our county.

Of the planning applications that have been determined in 2020, the views expressed by the SPS have to a greater or lesser extent been successfully reflected in 66% of the decisions. We consider this to be a good outcome and, in addition to this, SPS has continued to provide planning advice to many individuals and communities to help them understand and respond to planning issues that affect them.

Successful outcomes that we have been associated with include supporting a local community in their bid to protect a

much-loved wall in their parish by writing to Historic England and supporting the parish council in their bid to get the wall listed.

We are also great advocates of Neighbourhood Planning and have been pleased to provide technical training to local communities. In 2020 we continued to monitor draft Neighbourhood Plans (NP) and scrutinise them to ensure that the policies relating to heritage, landscape and design are appropriate and robust. We have also been assiduous in defending adopted NPs when development proposals come forward contrary to the policies contained within them. The recent Fressingfield case for 18 dwellings at Post Mill Lane has been a real breakthrough for the appropriate weight to be given to NPs in decision making when an authority's local plan is out of date. SPS provided support and encouragement to Fressingfield NP Group in their efforts to defend their plan which resulted in the planning authority taking Counsel's advice. This confirmed that significant weight must be given to the NP as it forms part of the council's Development Plan. We hope this bodes well for other NPs groups who find themselves having similar battles in defence of their adopted plan; we commend Fressingfield and are pleased that SPS could play its part in helping them achieve this victory.

The recent U-turn by the Government over the mutant algorithm (see chairman's article on page 4) on housing numbers which would have seen increased pressure

for housing in the Suffolk countryside is evidence of the contribution that a charity such as ours can make by mobilising public opinion and lobbying local MPs and councillors to resist these damaging policy changes that would harm rural counties such as ours.

We also added our weight to the many voices in the county who are campaigning for a more strategic approach to the transmission of wind energy via an offshore ring main. We submitted evidence to the Department of Business, Energy and Industrial Strategy to call for an inquiry into the lack of co-ordination of the delivery of green energy, and in particular, of wind energy off the east coast with the resulting pressure of transmission across the county's landscapes.

We hope you agree that the SPS performs an important service to Suffolk. We have a valuable role in providing the important checks and balances in a world of increasing deregulation of planning. Our reputation is strong and we enjoy a positive standing in the county amongst local decision makers and other environmental stakeholders. Furthermore, the charity's dedicated staff and trustees are committed to delivering the charitable objects of the SPS to a high standard. These are all assets that the charity can continue to build on despite the challenges that lie ahead.

We have worked hard to fulfil the commitments set out in our Manifesto for Suffolk in 2019 and are enormously grateful to all our members for their support.

Crinkle Crankle Wall, Great Waldingfield, added to the statutory list -SPS supported the parish council's application for listing. Photo: Bernard Rushton



Can you help SPS recover from the COVID19 pandemic?



suffolk
PRESERVATION SOCIETY

Will you invite a friend to join?

Small charities such as ours have suffered a significant drop in income during the last year. Our fundraising activities, have been brought to a halt by the COVID19 pandemic.

Will you help us to recover by asking a friend to join the Suffolk Preservation Society? If everyone introduced just one new member, SPS would be able to recover more quickly, be more resilient and have a brighter future. Will you help, please?

You can join online at

suffolksociety.org/become-a-member

or email as us

or call us at

sps@suffolksociety.org 01787 247 179 or 01379 788 207

You can also donate at

suffolksociety.org/donate



Looking up at Suffolk's starry skies

Suffolk is famous for its big skies. But is light pollution significantly reducing our enjoyment of them?

Excessive light pollution is a serious issue, impacting not only on nocturnal wildlife such as bats and owls, but also on human health and wellbeing. It contributes to broken sleep patterns and a sense of being disconnected from nature,

In February, during a cold and extremely snowy week when the Beast from the East mark II came to visit, the Suffolk Preservation Society invited its members to join virtually, and socially distanced of course, the annual Star Count. This was a citizen science project organised by the Society's sister organisation CPRE, The Countryside Charity and the British Astronomical Association.



Last year's survey suggested that more than three out of five respondents suffered from severe light pollution. How will this year's figures compare? Has the impact of the COVID19 pandemic and the third lockdown that we're experiencing changed our perceptions of light pollution?

The public were asked to look heavenwards during a clear night and count how many stars they could spot within the constellation of Orion, known as The Hunter. Unlike many such combinations of stars its shape vaguely imitates its attributes: the main part comprises four stars representing the body, whilst along its waist is a line of three more, suggesting at an admittedly less than butch belt.

Last year's survey suggested that more than three out of five respondents suffered from severe light pollution.

The number of respondents this year was the highest ever and the results of the Star Count are of particular interest for the Society as an important indicator of how well our decision makers are doing in safeguarding our special Suffolk skies.

The results from Star Count will help to make a map of where star-spotters are enjoying deep, dark skies and where views are affected by light pollution. By showing on a map where light pollution is most serious, we can work with local councils and other campaign groups to protect those areas which have so far escaped the worst.

The results will also allow us to ensure that the planning system is truly held to account in terms of requiring that new developments, whether they be houses

or factories or offices, adhere to the highest standards possible in terms of reducing light emissions, with for example street lighting that is adaptive and smart in terms of energy efficiency and unnecessary glare.

Nowhere is this requirement more urgent than in our Areas of Outstanding Natural Beauty which boast dark skies as one of their most significant special qualities. It is especially true in the Suffolk Coasts and Heaths AONB where large scale infrastructure energy projects are threatening this most important characteristic, and in another jewel in the county crown, the Dedham Vale Area of Outstanding Natural Beauty.

The Dedham Vale AONB is part way through the long and robust process of one of the few places in the country to be accorded what is known as 'dark sky status', by the International Dark Skies Association.

It was believed that Dedham Vale fell neatly within the criteria for IDS Dark Sky Reserve Bronze status.

Over the last few years, the Dedham Vale Society have been mapping out the quality of the night skies across the Vale, using sky-meters. The survey they undertook was to measure the light-levels in late evening and this has been completed.



This would act as a double-lock in helping to restrict and reduce light pollution in Dedham Vale and safeguarding night skies for future generations.

The further measurement of street-light output still has to be done but work came to a halt when the COVID19 pandemic struck. Up to that point, it was believed that the Vale fell neatly within the criteria for IDS Dark Sky Reserve Bronze status.

Hopefully, when the data collection is complete, it will be helpful in developing a Light Management Plan for the AONB. This would act as a double-lock in helping to restrict and reduce light pollution in the Vale and safeguarding night skies for future generations.

More information can be found on their website Summer 2016 *"Time to Preserve the Dark Skies of Dedham Vale"* and Summer 2017 *"Initial Dark Sky Survey Results"*.

Based on an article from a recent EADT edition by SPS Director, Fiona Cairns

Winter Stars

BY SARA TEASDALE

I went out at night alone;
The young blood flowing beyond the sea
Seemed to have drenched my spirit's wings—
I bore my sorrow heavily.

But when I lifted up my head
From shadows shaken on the snow,
I saw Orion in the east
Burn steadily as long ago.

From windows in my father's house,
Dreaming my dreams on winter nights,
I watched Orion as a girl
Above another city's lights.

Years go, dreams go, and youth goes too,
The world's heart breaks beneath its wars,
All things are changed, save in the east
The faithful beauty of the stars.

Source: Flame and Shadow (1920)

Bottom left
CPRE's Star Count,
A citizen science
project

Bottom right
Counting stars
in the Orion
constellation



List it before you've missed it the importance of Local Lists

The best of Ipswich's latest Local List by *Elizabeth Coughlin*



“workmen’s dwellings” at 2-46 Devonshire Road, an early example of public housing. Beside each front door of this brick terrace is the original cast iron boot scraper.

New residents plus new legislation meant a massive expansion of the education system. One of the first “Board Schools”, now The Westbridge Pupil Referral Unit at 71-6 London Road, is notable for its U-shaped floor plan, creating prominent and elegant frontages along two streets. The build quality of this and other schools, including Britannia Road Infants (1902), Ranelagh Road Primary (1906) and St. Helen’s in Woodbridge Road (1912) is indicative of the social values of the era.

Of course, orderly residential streets and dutiful pupils are only part of the story and there are also plenty of pubs on the Ipswich List. From the “The Inkerman”, named for a Crimean battle of 1854 to the dockers’ local, “The Ship Launch Inn”, many are still operating as licensed premises. The hospitality business was cut-throat with particular competition between the rival Suffolk brewers, the Tollemaches and the Cobbolds. The Tollemaches flaunted their status in the 1930s by building mock-baronial hosteleries modelled on the family home, Helmingham Hall. Of these so-called “Tolly Follies”, “The Cricketers” in Crown Street is still in business. The Cobbolds’ commercial retaliation took a more homely form in the shape of Arts and Crafts inns such as “The Earl Kitchener”.

An indication of less convivial gatherings can be found at the rear of Cecil and Geneva Roads. The Napoleonic Wars meant a very real fear of invasion for East Anglia and in 1796 the Ipswich Cavalry Barracks were built to provide permanent accommodation for 1,500 officers and men. Today only the red brick walls remain as evidence of the threat. A hundred and fifty or so years later, Britain was again in peril as the Nazis marched across Europe. An anti-tank gun emplacement at 235 Tuddenham Road serves as a reminder of those dark days.

Some of the more unusual additions to the latest List exemplify the challenging modernism of the 1950s and 60s.



Readers of Suffolk View will be aware of Historic England’s Statutory Listing Scheme, but perhaps less well-known is the existence of Local Lists. These cover buildings or features which, whilst not of national importance, are of architectural and historic interest or make a significant contribution to the character and appearance of their locale. Currently, the coverage across our County is rather haphazard. For example, Ipswich, Sudbury and the former Waveney Council have established lists, East Suffolk has adopted selection criteria and Babergh and Mid Suffolk Councils are still working on theirs. Although such designation does not offer legal protection, it may be taken into consideration in planning decisions.

As the oldest Anglo-Saxon town in England, it is hardly surprising that Ipswich has a cornucopia of architectural treasures and the Local List, originally compiled in 2013, has recently undergone a second revision with some interesting new inclusions.

As well as the obvious value in terms of aesthetics such buildings are an important historical resource. A small but significant example are the Boundary Markers in Lower Orwell Street and Alexandra Park. These stones are a relic of the ancient custom of “beating the bounds”, an annual ceremonial walk around the geographical boundary of a parish to enforce a sense of locality. Dating from at least Anglo-Saxon times, this ritual is still performed in various parts of Great Britain, including Brightlingsea in Essex.

Much of the List comprises residential property following a massive population boom in the 19th Century. Industries such as shipbuilding, tanning, malting and brewing brought prosperity and employment and a concomitant need for new homes. Well-designed suburbs for the middle classes were developed around Christchurch Park, Belstead Road, Constable Road, Gainsborough Road and Corder Road. More modest are the 23



The boom in church building in the interwar years provided Ipswich with St. Francis in Hawthorn Drive, St Mary Magdalene in Norwich Road and the Roman Catholic Chapel at St Joseph's College, all still used for religious purposes. Even more innovative, is the Spiral Car Park in Civic Drive. Completed in 1967 as part of the regeneration of the east of the town centre, it was described by Pevsner as "ingenious", and has a prominent tower, sweeping pavement and (sadly now defunct) mosaic water feature. Another futuristic new addition is the



Sports Dome at Dale Hall Community Primary School built by architects Birkin Howard in 1967. Unfortunately, despite its inspirational and practical value to pupils, the dome is in urgent need of repairs and currently unusable. It is easy to take our surroundings for granted or to only value the ancient, the beautiful or the truly monumental. However, as the Ipswich List shows, the multi-layered, incremental development of our environment is an invaluable historical resource. Its preservation is vital as it is the embodiment of our human story.

One of the final entries on the List, is the K6 telephone kiosk on Stoke Bridge. Designed by Sir Giles Gilbert Scott to commemorate George V's Silver Jubilee, this British icon is recognised around the world. Once its obsolescence would have seemed unthinkable, yet how long now before the idea of queuing to make a call with a jangling pocket of coppers is as quaint a concept as beating the bounds? So, if you value your heritage, it's not so much a case of "use it or lose it" as "list it before you've missed it".... a spur to action for all of us.



Left large
The Cricketers public house, Crown Street
©Ipswich Borough Council

Left small 1
Clifford Road Primary School – built in 1905 and included on the list for its architectural and social history interest ©Ipswich Borough Council

Left small 2
15 Cowper Street – included on the list for its architectural interest and group value for its association with heritage assets along Cowper Street.
©Ipswich Borough Council

Top right 1
The Barracks Wall
photo: Vincent Coughlin

Top right 2
The Sports' Dome at Dale Hall Community Primary School
©Ipswich Borough Council

Bottom right
The Spiral Car Park
photo: Vincent Coughlin

HAVOC ON THE

HIGH STREET

More challenges ahead for shops in our conservation areas?

Online shopping has been a lifeline to many during the long days of lockdown. It has, however, brought with it the less welcome consequence of accelerating the ongoing decline of many shops on our ailing high streets.

Prompted by the accelerated closures of retail outlets, caused both by the economic impact of the COVID19 pandemic and the increasing adoption of online shopping, the Supporting Housing Delivery and Public Service Infrastructure proposals consultation was recently launched. These Government proposals will make it easier to convert properties into housing, regardless of the size or location of the buildings involved.

SPS recognises that our high streets are changing. Furthermore, we welcome schemes that seek to manage that change to ensure that the retreat of retail shops, especially larger chains, is an opportunity to create balanced town centres that combine more independent retail, experience, cultural and housing elements.

Historic England's view:

In recent years, out of town retail sites, changing shopping habits and the growth of online retailing have all challenged town centres. As the number of people visiting and the range of shops to be found in town centres has changed, there has been a related impact on the local historic

character of town centre buildings, their range of uses and street patterns. These may well be permanent changes.

The decline in use of a number of particular types of buildings (for example pubs, post offices and banks) has added to the problem. Reduced footfall and increased vacancy rates in some areas has led to under-investment and a deterioration in the quality of the environment. Some high streets and town centres have entered a spiral of decline.

As a result, town centres and high streets are at a critical point. They need to reinforce and redefine their role and function at the centre of community activities in response to these economic and social shifts.

These challenges have a particular resonance for historic town centres and high streets. The sustained and successful stewardship of their buildings, streets and spaces is intertwined with the health of the retail economy.

SPS welcomes the efforts of Government through the Future Towns Fund and other initiatives to back projects which seek such transformations and supports, in principle, submissions from Ipswich and Lowestoft to secure up to £25m of this funding.

However, the key will be to encourage a diversity of functions in our town centres

such that no single use so dominates, and that our high streets are never again at risk of such shocks or seismic shifts.

We are concerned that the latest Government proposals could end up doing just that: replacing one monoculture (retail) with another (housing), harming commercial vitality and undermining the clustering effect of town centre uses.

These proposals will for the first time afford the right (known as 'permitted development') to convert restaurants, indoor sports centres, creches and so on to residential use. In addition, they stipulate that there should be no size limit on the scale of the conversions allowed. This could create homes that have unacceptably low standards of residential amenity, adjoining takeaways or pubs, with no parking, outlook or outside space.

Furthermore, these proposed changes would even apply to businesses in conservation areas such as Bury St Edmunds and Newmarket town centres.

Our worries about this wholesale shift are many. The most fundamental is that, if enacted, they might actually accelerate the decline in the retail presence in towns. How better, it might be thought, to find new uses for surplus floorspace and to add to the housing stock? But of course, having such a right to find new uses for retail floorspace might accelerate the loss of retail if greater value can be extracted by residential conversion.



Left
High Street,
Bury St Edmunds

Right
High Street,
Newmarket

The view of the Institute of Historic Building Conservation:

An increase in residential population around high streets will support continuing retail uses in a move away from destination shopping. Many historic towns have traditionally had a town centre population but there are many town centres with fewer people now living in them. More housing may be needed in town centres. New housing should always be sensitive infill which is well designed, of quality construction and most importantly to scale and in context. The location of new housing should be carefully considered to ensure it does not destroy the cohesion of the high street retail area, leading to further decline as shopping areas

get cut off from each other and stop footfall. The quality of existing town centre housing should also be improved, much of it, especially bedsits over and behind retail properties, can be cramped and sub-standard.

Such permitted development rights could loosen the requirements to appropriately maintain the external character of some of our most attractive high streets, many of which are designated as conservation areas and include high concentrations of both listed and more vulnerable non-listed buildings that might be subjects of such conversions. The consultation document raises the question about whether these permitted rights should exclude the ground floor level, which we think is an absolutely necessary safeguard against wholesale loss of character. This is not simply an aesthetic concern however: the attractiveness

of prosperous town centres to future visitors will be an even more important part of their 'offer' than at present.

SPS is also concerned at the further weakening of the role of local planners and planning committees in helping to direct the transformation of town centres, as these proposals seem to override their existing development plan policies.

The deadline for comments passed at the end of January. I'm pleased to say that SPS submitted a representation based on the above comments. Let's hope the Government is listening!

Based on an article from a recent EADT edition by SPS Director, Fiona Cairns



The former HSBC in Eye (right) is now converted into a community art centre and the former Barclays (left) is a wellbeing centre with only the cashpoint remaining



Elizabeth Coughlin

Suffolk Preservation Society

Suffolk Spotlight

BURY ST EDMUNDS

THE BURY SOCIETY, RODERICK REES

The Bury Society's big event of the year was putting together a very strong objection to the Appeal by the developers of the vacant Cornhill Walk premises on Brentgovell Street. We were represented by a specialist planning QC at the Public Inquiry and were thrilled that the Appeal was dismissed due to reasons relating to overlooking neighbours and local heritage impact. SPS had also objected to the plans on heritage impact grounds.

Over recent months we have seen a big increase in applications to convert commercial premises into residential use. These have included upstairs at the Palmers and Argos stores on the Buttermarket, Ashton's Grade I Listed offices on Guildhall Street, Lloyds Bank on Parkway

and the Health Centre on Looms Lane. Plans were approved to change the Bank of Scotland premises on Guildhall Street into a restaurant. Such applications are inevitable but The Society is keen to ensure good design and function. Shop vacancies in Bury are lower than the national average but there is now concern about the future of the Debenhams' iconic anchor store on the Arc.

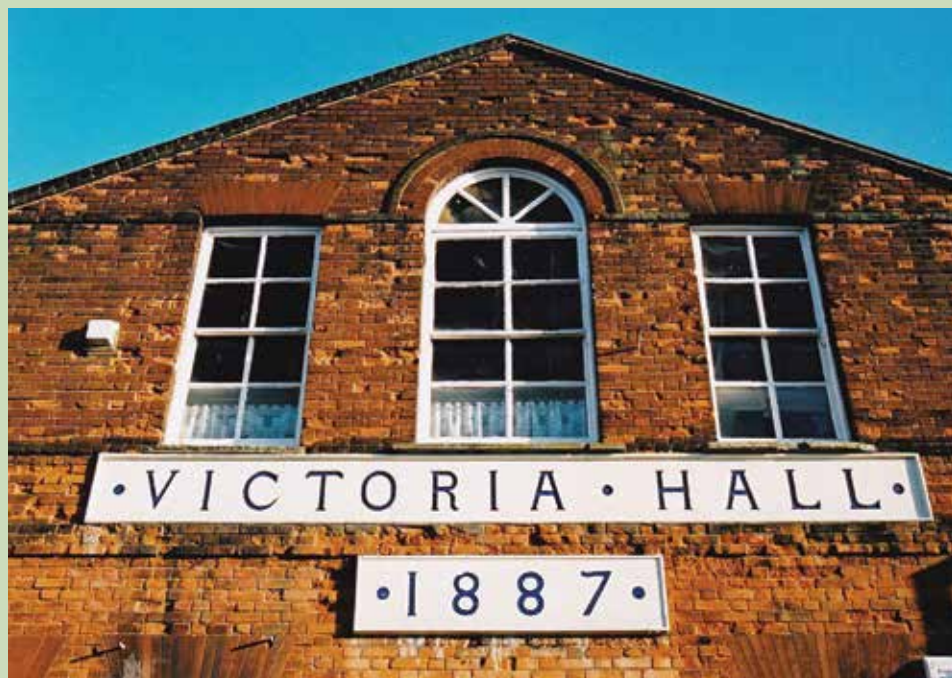
Elsewhere, the Society expressed general support for West Suffolk Council's plans to build a new public sector business hub on Western Way (which includes relocating the Leisure Centre) and for the new railway station entrance and car park. We also commented upon the design for the redevelopment of the new Post Office which is now under construction. Alongside SPS, the Society criticized the house designs for homes on the sites of

the former gas holder on Tayfen Road and the former St Louis Middle School on St Andrews Street South.

The Society was generally supportive of the West Suffolk Local Plan Review but emphasised the need to protect the town's status as a hub for shopping, entertainment, employment and education as well as its historic environment. We are strongly critical of Government plans to relax planning rules within conservation areas and adamant that local input remains vital for any regeneration plans.

The iconic Debenhams in Bury St Edmunds town centre, which has an uncertain future





On the Local List and facing the threat of demolition

SUDBURY

THE SUDBURY SOCIETY, ANGIE BENTLEY

The Sudbury Society is increasingly concerned and frustrated by recent planning decisions being taken by Sudbury Town Council and Babergh District Council which indicate a disturbing disregard for the unique qualities of our town and the significant buildings on its Local List. The following key buildings are under threat NOW:

Victoria Hall/Conservative Club /New Hall

Despite our strong objections, Sudbury Council supported the developer's plans for wholesale demolition of these Locally Listed buildings at the heart of a conservation area

Belle Vue House

Originally a family house, Belle Vue House is 150 years old this year and is again under threat of demolition. We urge Babergh District Council to consider the wider architectural and cultural value of the building

rather than opt for short term financial gain. With sensitive restoration it could be successfully re-purposed and preserved for future generations, even if public use proves unaffordable.

The nearby St Leonard's is a shining example of such an approach, with the conversion of the former Victorian hospital by Hartog Hutton for residential use being both commercially viable and an architectural triumph.

48 North Street

The Society has been asking Babergh's Heritage team for years to pursue the owners of this empty, deteriorating but grand and listed building due to its obvious neglect. Water is running down the internal walls and time is critically short. The Council must use its powers now and intervene before it is too late.

In conclusion, we fear that our planning authorities are asleep at the wheel putting the unique heritage of Sudbury at risk. We must unite to prevent our Local List being a record of the Local Lost Buildings.



Belle Vue House, stained glass window detail

Belle Vue House, a fine building included on the Sudbury Local List



St Leonards Hospital, prior to redevelopment

St Leonards has now been successfully restored and redeveloped



Suffolk Spotlight

IPSWICH

MIKE COOK, THE IPSWICH SOCIETY

As the country faces a killer pandemic so the structure of the developed world's towns is facing major change. The move to online shopping has led to mass closures, particularly in the UK where retail was dominated by a few global empires, many now defunct. Home working is likely to persist, with a profound effect on town centre economies as food and retail outlets become redundant.

The SPS and the Ipswich Society have objected vigorously to the Government's current planning proposals already outlined in this issue by the Chairman and the Director. On the streets of Ipswich, we continue to see a stream of proposals to convert smaller offices and the spaces above shops to small apartments and the conversion of two small hotels to HMOs. Currently, they still require planning permission which does ensure minimum standards of space (a resident shouldn't have to go outside to get from his room to the communal kitchen!). We fully support the idea of more people living in town centres but we need strategic planning to provide decent living and amenity spaces or we will simply be creating 21st century slums.

The Golden Mile and Carr Street, in particular, have been devastated by shop closures, including the loss of Debenhams, Lakeland, Argos, the Co-Op and (less recently) Woolworths. The future of

these sites is uncertain. Some, such as The Ancient House, would be an asset for communal use but IBC, a prospective purchaser, may be reluctant to forgo the rental income. The Argos site currently has permission to divide the ground floor into smaller units and convert the upper floors into apartments. In contrast, the Co-op building is currently under threat of total demolition in order to provide a new primary school. The Department of Education claim that it would be both impractical and too expensive to retain even the facade, however discussions are ongoing about this important heritage streetscape.

ALDEBURGH

THE ALDEBURGH SOCIETY, PAUL BONGERS DE RATH

As the civic society for Aldeburgh, we mainly concern ourselves with threats from unsuitable development and problems arising from the prevalence of holiday homes and tourism pressures. We work in close association with the Town Council in seeking to maintain the vibrancy of the historic High Street and beach area and securing sufficient services from the district and county councils. We welcome good modern architecture, and we are keen to see more provision to promote walking and cycling in and around our area.

The Government's proposed reforms to the planning system have worried us considerably, with the prospect of

development proceeding without adequate public consultation and a reduced role for local planning authorities. We have commented in detail to the Department and we fully support SPS's action on this front.

Overshadowing all this, however, has been the threat coming from major proposed energy developments on the heritage coast. The cumulative effects of wind farm projects by Scottish Power Renewables and National Grid, and EDF's Sizewell C nuclear power station, are too great for this fragile, nationally protected coastal environment to bear.

We are strongly in favour of renewable energy and we are not opposed in principle to nuclear power. But we decided we had to oppose both of these projects because their construction, however well managed, would place unbearable strains on the rural road network and would pose severe threats to the economy and social fabric of Aldeburgh and neighbouring villages. Aldeburgh depends upon visitors to the many cultural and community events taking place through the year and the peacefulness of the area is shown in surveys to be a major attraction. Traffic delays, noise, dust and vibration, loss of the dark skies, could too easily turn visitors away.

The Development Consent Application for the wind farms is currently in a six-month detailed examination process by the Planning Inspectorate. The Sizewell application will start examination in a few weeks. In very efficiently conducted virtual hearings, upwards of 100 local bodies and residents have expressed well-founded opposition to the proposal to bring the wind farms' power ashore at Thorpeness and through trenches to large industrial buildings next to the historic village of Friston to connect to the existing national gridlines. We and many others are totally opposed to this assault upon the Suffolk Coast and Heaths AONB. An undersea grid connecting several wind farms and bringing their power ashore to a brownfield site closer to main population centres, as they have on the other side of the North Sea, would be a much greener approach to renewable energy generation.



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Founded in 1929, the SPS Charitable Incorporated Organisation No. 1154806 is working to safeguard the buildings and landscape of Suffolk.

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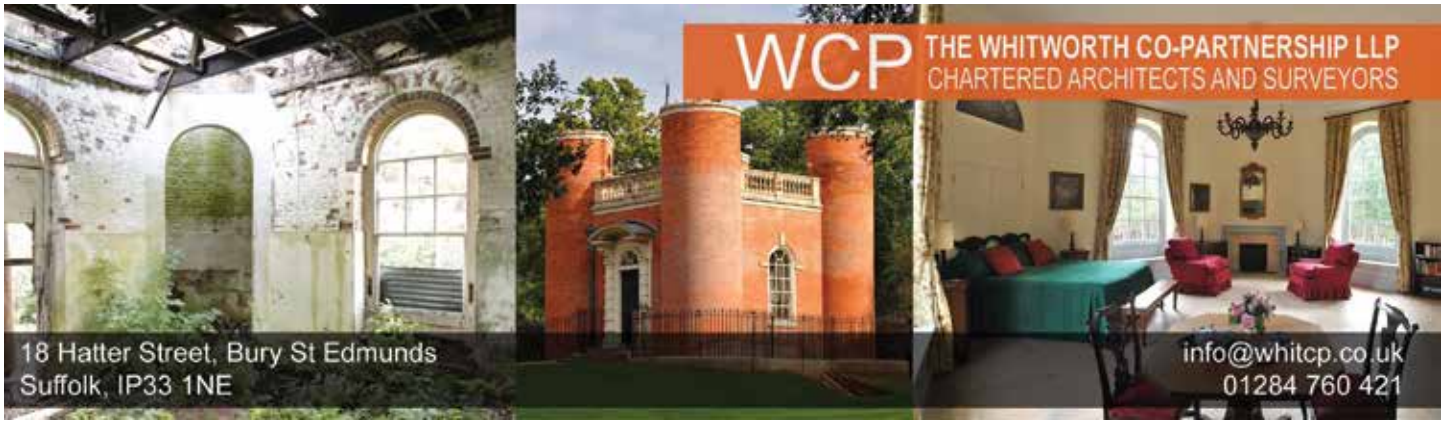


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